

**FCC Form 481 - Carrier Annual Reporting
Data Collection Form**

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

<010> Study Area Code	310732
<015> Study Area Name	UPPER PENINSULA TEL
<020> Program Year	2015
<030> Contact Name: Person USAC should contact with questions about this data	Vicki Kakuk
<035> Contact Telephone Number: Number of the person identified in data line <030>	8006424227 ext.1003
<039> Contact Email Address: Email of the person identified in data line <030>	vicki.kakuk@alphacomm.net

ANNUAL REPORTING FOR ALL CARRIERS	54.313	54.422
	Completion Required	Completion Required

			<i>(check box when complete)</i>	
<100> Service Quality Improvement Reporting	<i>(complete attached worksheet)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<200> Outage Reporting (voice)	<i>(complete attached worksheet)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210> <input type="checkbox"/> <-- check box if no outages to report		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<300> Unfulfilled Service Requests (voice)	<input type="text" value="0"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<310> Detail on Attempts (voice)	<div style="border: 1px solid black; height: 40px; width: 100%;"></div> <i>(attach descriptive document)</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<320> Unfulfilled Service Requests (broadband)	<input type="text" value="0"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<330> Detail on Attempts (broadband)	<div style="border: 1px solid black; height: 40px; width: 100%;"></div> <i>(attach descriptive document)</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<400> Number of Complaints per 1,000 customers (voice)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<410> Fixed	<input type="text" value="0.0"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420> Mobile	<input type="text" value="0.0"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<430> Number of Complaints per 1,000 customers (broadband)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<440> Fixed	<input type="text" value="0.0"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<450> Mobile	<input type="text" value="0.0"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<500> Service Quality Standards & Consumer Protection Rules Compliance	<i>(check to indicate certification)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510> <div style="border: 1px solid black; padding: 2px;">310732mi510.pdf</div>	<i>(attached descriptive document)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600> Functionality in Emergency Situations	<i>(check to indicate certification)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610> <div style="border: 1px solid black; padding: 2px;">310732mi610.pdf</div>	<i>(attached descriptive document)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700> Company Price Offerings (voice)	<i>(complete attached worksheet)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<710> Company Price Offerings (broadband)	<i>(complete attached worksheet)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<800> Operating Companies and Affiliates	<i>(complete attached worksheet)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900> Tribal Land Offerings (Y/N)?	<input type="radio"/> <input checked="" type="radio"/> <i>(if yes, complete attached worksheet)</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1000> Voice Services Rate Comparability	<i>(check to indicate certification)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1010> <div style="border: 1px solid black; padding: 2px;">310732mi1010.pdf</div>	<i>(attach descriptive document)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1100> Terrestrial Backhaul (Y/N)?	<input checked="" type="radio"/> <input type="radio"/> <i>(if not, check to indicate certification)</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1110>	<i>(complete attached worksheet)</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1200> Terms and Condition for Lifeline Customers	<i>(complete attached worksheet)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

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

Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet

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

**(100) Service Quality Improvement Reporting
Data Collection Form**

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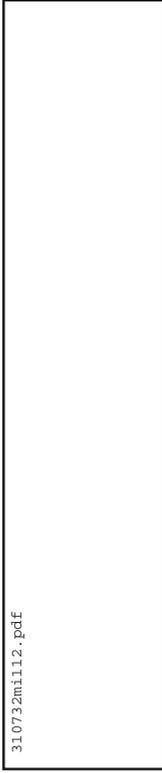
<010>	Study Area Code	310732
<015>	Study Area Name	UPPER PENINSULA TEL
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Vicki Kakuk
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<039>	Contact Email Address - Email Address of person identified in data line <030>	vicki.kakuk@aphacomm.net

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

<111> If your answer to Line <110> is yes, do you have an existing "54.202(a)" "5 year plan" filed with the FCC? (yes / no) (yes / no)

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

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



Name of Attached Document

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

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

**(900) Tribal Lands Reporting
Data Collection Form**

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<030>	Contact Name - Person USAC should contact regarding this data	Vicki Kakuk
<035>	Contact Telephone Number - Number of person identified in data line <030>	8006424227 ext. 1003
<039>	Contact Email Address - Email Address of person identified in data line <030>	vicki.kakuk@alphacomm.net

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

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

Select (Yes, No, NA)

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

**(1100) No Terrestrial Backhaul Reporting
Data Collection Form**

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<035>	Contact Telephone Number - Number of person identified in data line <030>	8006424227 ext. 1003
<039>	Contact Email Address - Email Address of person identified in data line <030>	vicki_kakuk@lphacomm.net

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

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

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

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<039>	Contact Email Address - Email Address of person identified in data line <030>	vicki_kakuk@lpha.com.net

310732mi1210.pdf

Name of Attached Document

<1220>	Link to Public Website	HTTP	http://www2.michbbs.com/images/1-14%20lifeline%20for%20web%20site%201-31-14.pdf
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"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

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 <035> Contact Telephone Number - Number of person identified in data line <030> 8006424227 ext.1003
 <039> Contact Email Address - Email Address of person identified in data line <030> vicki.kakuk@lphacomm.net

CHECK the boxes below to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e) the information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting
 <2010> 2nd Year Certification (47 CFR § 54.313(b)(1))
 <2011> 3rd Year Certification (47 CFR § 54.313(b)(2))

Price Cap Carrier Receiving Frozen Support Certification (47 CFR § 54.312(a))
 <2012> 2013 Frozen Support Certification
 <2013> 2014 Frozen Support Certification
 <2014> 2015 Frozen Support Certification
 <2015> 2016 and future Frozen Support Certification

Price Cap Carrier Connect America ICC Support (47 CFR § 54.313(d))
 <2016> Certification Support Used to Build Broadband

Connect America Phase II Reporting (47 CFR § 54.313(e))
 <2017> 3rd year Broadband Service Certification
 <2018> 5th year Broadband Service Certification
 <2019> Interim Progress Certification

<2020> Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

<2021> Interim Progress Community Anchor Institutions

Name of Attached Document Listing Required Information

(3000) Rate Of Return Carrier Additional Documentation
Data Collection Form

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<010> Study Area Code 310732
 <015> Study Area Name UPPER PENINSULA TEL
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 <035> Contact Telephone Number - Number of person identified in data line <030> 8006424227 ext. 1003
 <039> Contact Email Address - Email Address of person identified in data line <030> vicki.kakuk@alphacomm.net

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

(3010) Progress Report on 5 Year Plan Milestone Certification (47 CFR § 54.313(f)(1)(ii))		Name of Attached Document Listing Required Information
(3011) Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313(f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.		Name of Attached Document Listing Required Information (Yes/No) <input type="checkbox"/> (Yes/No) <input type="checkbox"/>
(3012) Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))		Name of Attached Document Listing Required Information (Yes/No) <input type="checkbox"/> (Yes/No) <input type="checkbox"/>
(3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))		Name of Attached Document Listing Required Information (Yes/No) <input type="checkbox"/> (Yes/No) <input type="checkbox"/>
(3014) If yes, does your company file the RUS annual report		Name of Attached Document Listing Required Information (Yes/No) <input type="checkbox"/> (Yes/No) <input type="checkbox"/>
Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:		
(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)		Name of Attached Document Listing Required Information (Yes/No) <input type="checkbox"/> (Yes/No) <input type="checkbox"/>
(3016) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows		Name of Attached Document Listing Required Information (Yes/No) <input type="checkbox"/> (Yes/No) <input type="checkbox"/>
(3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation		Name of Attached Document Listing Required Information (Yes/No) <input type="checkbox"/> (Yes/No) <input type="checkbox"/>
(3018) If the response is no on line 3014, is your company audited? If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains		Name of Attached Document Listing Required Information (Yes/No) <input type="checkbox"/> (Yes/No) <input type="checkbox"/>
(3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications		Name of Attached Document Listing Required Information (Yes/No) <input type="checkbox"/> (Yes/No) <input type="checkbox"/>
(3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows		Name of Attached Document Listing Required Information (Yes/No) <input type="checkbox"/> (Yes/No) <input type="checkbox"/>
(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:		Name of Attached Document Listing Required Information (Yes/No) <input type="checkbox"/> (Yes/No) <input type="checkbox"/>
(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,		Name of Attached Document Listing Required Information (Yes/No) <input type="checkbox"/> (Yes/No) <input type="checkbox"/>
(3023) Underlying information subjected to a review by an independent certified public accountant		Name of Attached Document Listing Required Information (Yes/No) <input type="checkbox"/> (Yes/No) <input type="checkbox"/>
(3024) Underlying information subjected to an officer certification.		Name of Attached Document Listing Required Information (Yes/No) <input type="checkbox"/> (Yes/No) <input type="checkbox"/>
(3025) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows		Name of Attached Document Listing Required Information (Yes/No) <input type="checkbox"/> (Yes/No) <input type="checkbox"/>
(3026) Attach the worksheet listing required information		Name of Attached Document Listing Required Information (Yes/No) <input type="checkbox"/> (Yes/No) <input type="checkbox"/>

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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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:	UPPER PENINSULA TEL
Signature of Authorized Officer:	CERTIFIED ONLINE Date 06/27/2014
Printed name of Authorized Officer:	David Hoover
Title or position of Authorized Officer:	President & General Manager
Telephone number of Authorized Officer:	9066394500 ext.
Study Area Code of Reporting Carrier:	310732 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.	

Certification - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<039>	Contact Email Address - Email Address of person identified in data line <030>	vicki.kakuk@alphacomm.net

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

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent: _____	
Name of Reporting Carrier: _____	
Signature of Authorized Officer: _____	Date: _____
Printed name of Authorized Officer: _____	
Title or position of Authorized Officer: _____	
Telephone number of Authorized Officer: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
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: _____	
Name of Authorized Agent or Employee of Agent: _____	
Signature of Authorized Agent or Employee of Agent: _____	Date: _____
Printed name of Authorized Agent or Employee of Agent: _____	
Title or position of Authorized Agent or Employee of Agent: _____	
Telephone number of Authorized Agent or Employee of Agent: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
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

File name: 310732mi112.pdf

**Upper Peninsula Telephone Company, Inc.
Line 112 – Five-Year Service Quality Improvement Plan**

As required in 47 C.F.R. § 54.202(a)(1)(ii), the following pages provide the Company's five-year service quality improvement plan that describes with specificity the proposed improvements and/or upgrades over the next five years to the applicant's network throughout the Company's service area. While the plan being presented for this Rural Local Exchange Carrier ("RLEC") is based on the best information that we have at this time, it is important to note that circumstances may change, such that the five-year service quality improvement plan being presented herein, may need to change substantially including, but not limited to, changes based on factors such as those listed below:

BUSINESS CHARACTERISTICS OF THE RURAL INCUMBENT LOCAL EXCHANGE CARRIER (RILEC):

Upper Peninsula Telephone Company has an average of 2.3 customers per mile for all fifteen of its exchanges. Many of these exchanges have less than 50 customers. As a comparison, an urban local-exchange carrier would have greater than 1,000 customers per mile served and have tens of thousands of customers per exchange. Their ROI model would differ significantly from those of the RILEC. Universal Service Funding makes possible the delivery of advanced services to the rural customer. Without public funding, implementing advanced technologies would not be possible in rural communities. USF funding, has been the most important component in establishing and supporting communication services for rural and underprivileged Americans across the United States. We believe the FCC should continue a stable and robust support program for all rural Americans by and through the rural RILEC, now and into the future.

ISSUES WHICH MAY REQUIRE FUTURE MODIFICATIONS TO THE COMPANY'S FIVE-YEAR PLAN:

The five-year plan, as detailed on the following pages, is subject to the following.

If any of these, or items similar to these, occur, the Company may need to modify the five-year plan.

- 1) **Revenue Recovery:** The ability to finance the capital expenditures planned for the five-year plan period, either through internally generated funds or external financing, are predicated on the expected revenue flows to be derived by these capital expenditures. If revenues would not be achieved either due to changes in regulations including, but not limited to, reductions in federal or state universal service support mechanisms or inter-carrier compensation or by significant reductions in the number of services subscribed to by the Company's customers, adjustments to the proposed capital expenditures in the five-year plan would be required. For example, if the support revenues that would be derived based on the capital expenditures would be reduced due to eliminations of Universal Service Fund ("USF") mechanisms or significant changes to those USF programs, revisions to the five-year plan may be required.

Upper Peninsula Telephone Company, Inc.
Line 112 – Five-Year Service Quality Improvement Plan (Cont’d)

In addition, if USF programs remain the same, but due to the computation of the program, USF revenues decline, adjustments to the five-year plan may be required. For example, if increases in the National Average Cost Per Loop (“NACPL”), which are very difficult to predict, substantially reduces the High Cost Loop Support (“HCLS”) for the Company or if the impact of the corporate cap on the Interstate Common Line Support (“ICLS”) mechanisms were to substantially reduce the Company’s USF payments, then the capital expenditures in the five-year plan may need to be reduced.

- 1) **Permits:** It is not possible to predict the ability to obtain all necessary permits, including easements and rights-of-way, within the five-year time-frame required to complete the capital expenditures included in the Company’s five-year plan. Permits can be, and often are, delayed significantly by various governmental agencies and those delays are totally outside the control of the Company.
- 2) **Weather Issues:** It is not possible to predict the impact of the weather on the installation of the capital expenditures included in the Company’s five-year plan. For example, if the ground is frozen, the timing of installing facilities can be significantly delayed and those delays are totally outside the control of the Company.
- 3) **Lead Time to Obtain Materials from Vendors:** It is not possible to predict when a material critical for the capital expenditures included in the Company’s five-year plan may come into a shortage situation. For example, in the last couple of years, the industry experienced a shortage of fiber optic cable where there was an 18-month lead time to obtain fiber optic cable. Delays of this nature are impossible to predict and are totally outside the control of the Company.
- 4) **Lead time to get Contractors to Install Facilities:** Just as with the materials, the Company has experienced times when it was not able to obtain contractors to install the equipment because the Company is not large enough compared to other firms wanting the contractor to do work for them. Therefore, the Company had to wait until much later than anticipated to get the contractor to come install the facilities for them. Once again, delays of this nature are impossible to predict and are totally outside the control of the Company.
- 5) **Increases in Construction Costs:** Just as with any business, it is impossible to predict if certain key material or installation costs will increase significantly during the period of time included in this five-year plan. During the last few decades, the telecommunications industry has undergone periods of time where material and installation costs escalated due to circumstances beyond the control of the Company (e.g., Hurricane Katrina, etc.). Price increases of this nature are impossible to predict and are totally outside the control of the Company.

Upper Peninsula Telephone Company, Inc.
Line 112 – Five-Year Service Quality Improvement Plan (Cont’d)

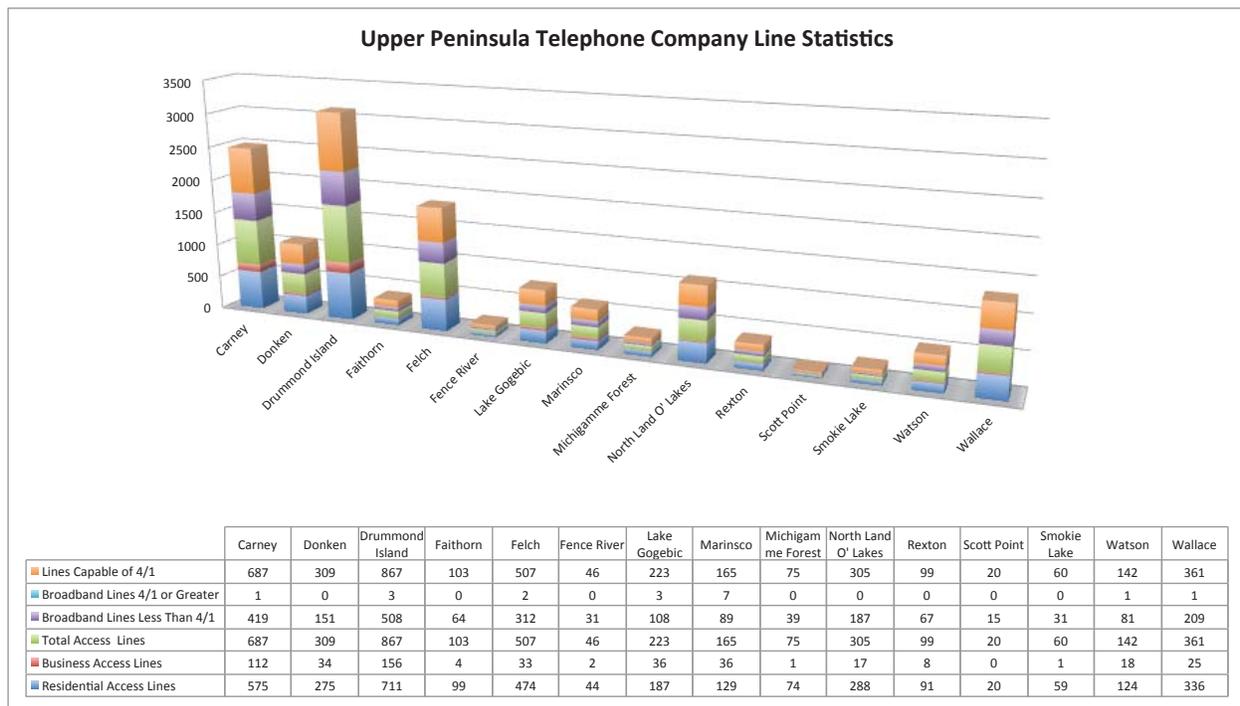
FIVE-YEAR PLAN OVERVIEW:

In addition to providing voice and broadband services, the company provides custom calling features and long distance services to the customers located in its service area. The Company has developed this five-year plan in order to continue to improve service quality, coverage and/or capacity to the subscribers located in its RLEC service area.

The Company provides service primarily through the use of fiber optic cable and electronics between the central offices and between the central offices and the subscriber terminal equipment (e.g., Digital Loop Carriers (“DLCs”)) in the field. The last mile facilities are generally provided over copper. When funding becomes available, the company is positioned to upgrade last mile copper to fiber optic facilities. When regulation permits, the Company is able to convert its entire regulated base from TDM-based network to an IP-network and is continually assessing the most cost-effective technology solutions to provide our customers the services they request.

COMPANY SERVICE AREA INCLUDED IN FIVE-YEAR PLAN:

The Company serves a very rural, sparsely populated portion of the United States where there are numerous challenges to serving the most rural customer locations. Within the RLEC’s service territory of approximately 2,800 square miles, the company provides voice service to residential and business access lines and broadband service as shown below:



Each exchange in the company only has one wire center; therefore, the five-year plan is presented at the exchange level (which is also the wire center level). The above chart shows the breakdown of the number of access lines by exchange within the RLEC territory for residence and business and the number of broadband lines subscribed to by customers at a speed less than 4 Mbps down and 1 Mbps up and those broadband lines at or above a speed of 4 Mbps down and 1 Mbps up.

Upper Peninsula Telephone Company, Inc.
Line 112 – Five-Year Service Quality Improvement Plan (Cont’d)

As shown on the chart above, there are still a significant number of customers that subscribe to broadband service at a speed less than 4 Mbps down and 1 Mbps up. The company is making significant efforts to market and transition customers to higher speed service so that they can have the full benefit of the information super-highway.

FIVE-YEAR CAPITAL SPENDING INCLUDING FACILITIES TO SHORTEN LOOP LENGTH, INTEREXCHANGE INTERCONNECTING FACILITIES, AND TOTAL EXPENDITURES.

FACILITIES TO SHORTEN LOOP LENGTH:

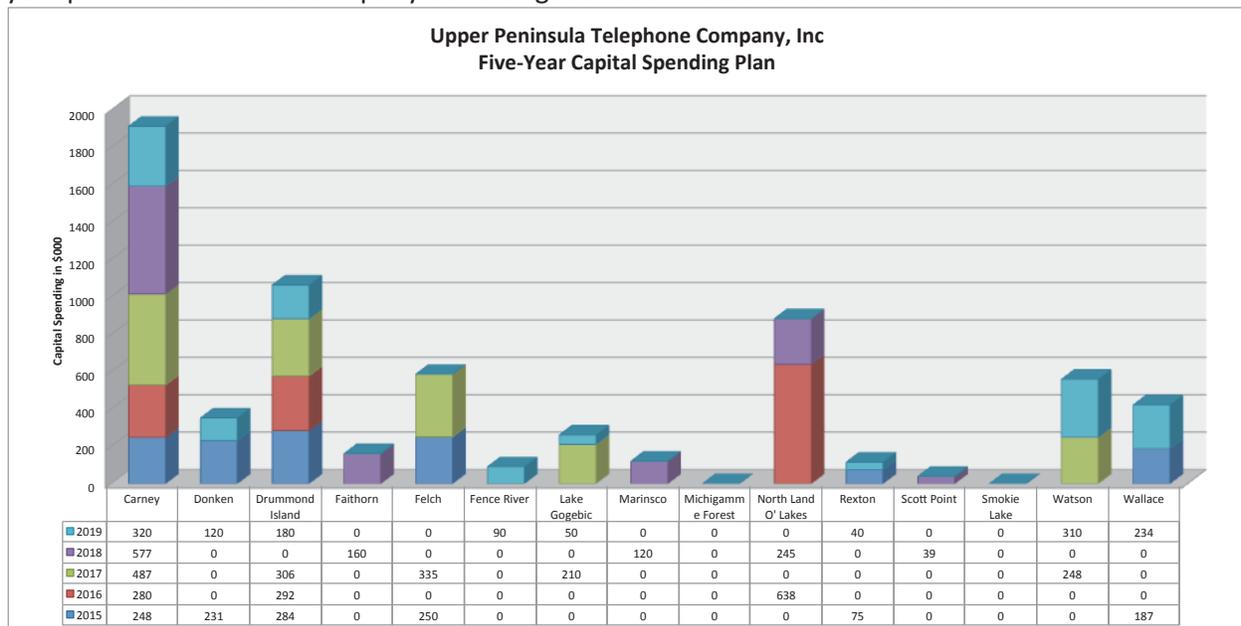
The Company understands that customers continually want and need more bandwidth. Due to the extremely remote territory of the customer, one of the obstacles to providing greater speeds to some of the Company’s customers is the distance from the nearest electronic site to the customer location. Shortening that portion of the loop allows the company to provide greater speed; therefore, the Company intends to install cable and wire facilities and/or circuit equipment in each of the Company’s exchanges.

INTEREXCHANGE FACILITIES:

The Company’s exchanges are predominately interconnected with fiber optic cable and electronics. In a few cases, due to terrain or other conditions, microwave or other technologies, may be used. For enhancements and upgrades to the Company’s interexchange facilities, the Company intends to install additional cable and wire facilities and/or circuit equipment in each of the Company’s exchanges.

TOTAL ESTIMATED CAPITAL EXPENDITURES BY EXCHANGE:

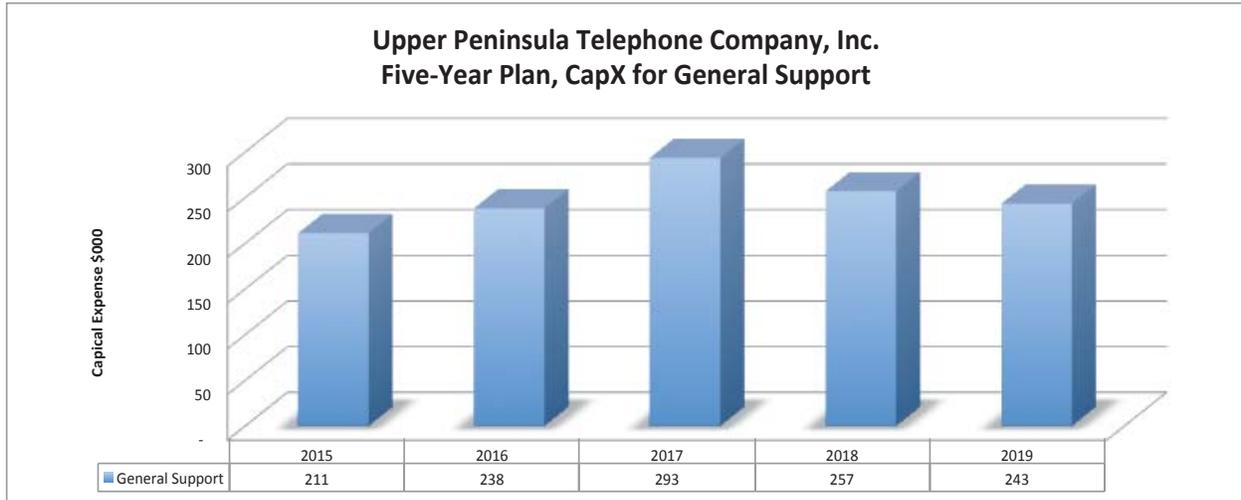
The total estimated regulated capital expenditures for the RLEC for each of the years in the five-year plan in each of the Company’s exchanges are estimated to be as follows:



**Upper Peninsula Telephone Company, Inc.
Line 112 – Five-Year Service Quality Improvement Plan (Cont’d)**

GENERAL SUPPORT FACILITIES:

The Company must continually upgrade the general support facilities (i.e., computers, furniture, office equipment, vehicles, land and buildings) due to technology changes, obsolescence and personnel needs in order to provide both voice and broadband service to its customers. The following is the current plan for general support facility capital expenditures in the five-year plan:



COMPANY POLICY TO DETERMINE IF A REQUEST FOR BROADBAND SERVICE IS REASONABLE:

Under the framework adopted by the Federal Communications Commission (“FCC”) in the *USF/ICC Transformation Order*, as a rate-of-return carrier, the Company, is required to deploy broadband-capable infrastructure to a customer upon reasonable request.

The FCC expressly recognized that there are some areas of the country where it is cost prohibitive to extend broadband using terrestrial wireline technology and, that in some areas, satellite or fixed wireless technologies may be more cost-effective options to extend service.

It is the Company’s policy to deploy broadband-capable infrastructure to a customer, upon reasonable request, as defined below.

GENERAL POLICY:

When evaluating a request to extend broadband service, the Company shall consider whether it would be reasonable to make the necessary upgrades in light of anticipated revenues. A reasonable request is one where the Company could cost-effectively extend a voice and broadband-capable network to that location. In determining whether a particular upgrade is cost effective, the Company shall consider not only its anticipated end-user revenues from the services to be offered over that network, both voice and retail broadband internet access, but also other sources of support, such as federal and, where available, state universal service funding projected to be available under current rules.

Upper Peninsula Telephone Company, Inc.
Line 112 – Five-Year Service Quality Improvement Plan (Cont’d)

In considering end-user revenues, the Company shall take into account the reasonable comparability benchmark for broadband services, as appropriate. If the incremental cost of undertaking the necessary upgrades to a particular location exceed the revenues that could be expected from that upgraded line, a request would not be reasonable.

A request to upgrade an existing voice line to provide broadband service would not be reasonable if it would require new investments that would cause total high-cost support, excluding CAF ICC, to exceed \$250 per line per month in a given study area.

As the FCC determined in the *Third Order on Reconsideration*, the Company may also take into account backhaul costs or other unique circumstances that may make it cost-prohibitive to extend service to particular customers.

EXTENUATING CONSIDERATIONS AND EXECUTIVE APPROVALS:

In addition to the above stated general policy, additional factors, including, but not limited to, items such the following shall be considered prior to denying the provision of broadband service based on a request of a customer as not reasonable:

- Extremely high potential for significant other residential or business customers in the area within a reasonable amount of time.
- Anchor institution requirements.
- Possible community development potential.
- Health and public safety concerns, including, but not limited to, E-911 issues.
- Other health, economic development and/or welfare factors.
- Financing agency or Commission, either state or federal, mandates or requirements.

If it is determined that additional, extenuating circumstances are relevant and should be considered, Company executive review and approval is required for the project to be undertaken if does not meet the terms of the general policy stated above.

FURTHER SPEED ENHANCEMENTS: If the FCC were to revise its broadband performance obligations to require higher speeds, such as 10 Mbps downstream, new deployments would, most likely, be required to meet the new benchmark. The Company would only be required to meet that higher speed if the request for service was *reasonable*.

Upper Peninsula Telephone Company, Inc.
Line 112 – Five-Year Service Quality Improvement Plan (Cont'd)

CONCLUSION:

The Company's five-year service quality improvement plan is designed to continue to improve and upgrade facilities in order to provide customers with the highest quality voice and broadband service in the most cost-effective manner. This includes shortening the length of the loops, as needed, in order to provide greater bandwidth to the customer, augmenting and upgrading the interexchange facilities, as needed, to provide greater speeds and sufficient facilities for special access circuits, including, but not limited to, dedicated facilities to wireless towers, modifying switching equipment, as needed, in order to provide the services and features desired by the customer, and adding/replacing general support equipment, as needed, in order to continue to operate as a company and provide service to the end user.

Upper Peninsula Telephone Company

Line 510 - Compliance with Service Quality Standards and Consumer Protection

As required in 47 C.F.R. § 54.313(a)(5) for High-cost Recipients, the following is a detailed description of how the Company complies with Service Quality Standards and Consumer Protection Rules.

SERVICE QUALITY STANDARDS: The Company abides by the general industry standards for service quality. The Company takes quality of service very seriously and is continually training the employees in order to make certain that the highest level of service is provided to the customers.

CONSUMER PROTECTION RULES:

The Company developed and implemented a Customer Proprietary Network Information ("CPNI") Compliance Manual and has appointed a CPNI Compliance Officer. Annually, the Company requires all employees to certify that they have reviewed and understand the CPNI Compliance Manual and that they understand that any violation of the Company's CPNI procedures may result in disciplinary action up to and including dismissal. The Company files an annual report with the Federal Communications Commission ("FCC") certifying compliance with the FCC's CPNI rules.

The Company also developed and implemented an Identity Theft Prevention Program Manual and has appointed a Red Flag Coordinator. Annually, the Company requires all employees certify that they have reviewed and understand the Identity Theft Prevention Program Manual. Further, employees must certify that they understand that any violation of the Company's identity theft prevention procedures may result in disciplinary action up to and including dismissal.

310732mi510

Upper Peninsula Telephone Company

Compliance with Service Quality Standards and Consumer Protection

The State of Michigan has no quality of service rules in place at this time.

File name: 310732mi610

**Upper Peninsula Telephone Company
Line 610 – Functionality in Emergency Situations**

As required in 47 C.F.R. § 54.313(a)(6) for all high cost recipients, which includes the Company, and as set forth in 47 C.F.R. § 54.202(a)(2), the following provides a detailed description demonstrating that the Company has the ability to remain functional in emergency situations, including a demonstration that 1) it has a reasonable amount of back-up power to ensure functionality without an external power source, 2) is able to reroute traffic around damaged facilities, and 3) is capable of managing traffic spikes resulting from emergency situations.

OVERALL RESPONSE TO EMERGENCY SITUATIONS: The Company has a comprehensive disaster recovery plan (also called a “continuity plan”) that was developed and implemented for the Company specifically to deal with emergencies. It has detailed, specific steps that are to be taken for each type of emergency.

POWER: In order to function in an emergency, the Company has a combination of batteries and emergency generators. Some locations have permanent emergency generators with fuel tanks; whereas, other locations require a portable generator to be brought to the location to recharge the on-site batteries. The company owns several portable generators that technicians can take out to recharge the batteries. For example, the company’s central offices have automatic stand-by generators to run the entire offices. The digital loop carrier (“DLC”) sites also have battery back-up.

REROUTING TRAFFIC AND REDUNDANCY: The Company has established 100% redundant E-911 trunks and SS-7 routes. In addition, the network was designed with redundancy, wherever possible, especially in the backbone network. Where it is not redundant, the Company has the ability to redirect most backbone traffic. In cases where there is no redundancy, it is due to the extreme cost of a 100% redundant network. For example, the loop to the customer location is typically not redundant, especially for residential customers. This is because it would not be cost effective to build totally separate facilities for the “last mile” to the customer.

MANAGING TRAFFIC SPIKES: The Company realizes that when a catastrophe happens, everyone immediately tries to contact friends and family to make certain they are all right. The Company has designed the network to have excess capacity on its backbone network. For example, on Mother’s Day, the company handles traffic without the customer receiving the “All Trunks Busy” message which demonstrates the Company’s ability to handle peak traffic spikes.

**(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	310732
<015>	Study Area Name	UPPER PENINSULA TEL
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Vicki Kakuk
<035>	Contact Telephone Number - Number of person identified in data line <030>	8006424227 ext .1003
<039>	Contact Email Address - Email Address of person identified in data line <030>	vicki.kakuk@alphacomm.net
<810>	Reporting Carrier	Upper Peninsula Telephone Company
<811>	Holding Company	LICT Corporation
<812>	Operating Company	Upper Peninsula Telephone Company

<813>	<a1>	<a2>	<a3>
	Affiliates	SAC	Doing Business As Company or Brand Designation
	DUNKIRK & FREDONIA TELEPHONE COMPANY	150091	Dunkirk & Fredonia Telephone, DFT, Netsync, DFT Communications
	UPPER PENINSULA TELEPHONE COMPANY	310732	Michigan Broadband Services, UPTC, MCBC, Alphacomm.net
	MICHIGAN CENTRAL BROADBAND COMPANY	310785	Michigan Broadband Services, MCBC, Alphacomm.net
	BELMONT TELEPHONE COMPANY	330847	Belmont, LaGrant Connections, LLC
	CUBA CITY TELEPHONE EXCHANGE COMPANY	330872	Cuba City, LaGrant Connections, LLC
	CENTRAL SCOTT TELEPHONE COMPANY	351125	Central Scott
	CST COMMUNICATIONS, INC.	359032	CST Communications, iwireless
	INTERCOMMUNITY TELEPHONE COMPANY	381616	InterCommunity
	HAVILAND TELEPHONE COMPANY, INC.	411780	Haviland, Giant Communications, Inc.
	J. B. N. TELEPHONE COMPANY, INC.	411785	J.B.N., Giant Communications, Inc.
	WESTERN NEW MEXICO TELEPHONE COMPANY, INC.	492268	WNM Communications
	CENTRAL UTAH TEL INC	502277	CentraCom Interactive
	SKYLINE TELECOM	502283	CentraCom Interactive
	BEAR LAKE COMM	503032	CentraCom Interactive
	CAL-ORE TELEPHONE COMPANY	542311	Cal-Ore
	Giant Communications, Inc.		Giant
	Alpha Enterprises Limited, Inc.		Alphacomm.net
	World Surfer, Inc.		World Surfer
	Netsync Internet Services Corporation		Netsync
	Valley Communications, Inc.		Valley
	Central Telcom Services, LLC		CentraCom Interactive
	LaGrant Connections, LLC		LaGrant Connections, LLC
	WNM Communications Corporation		WNM Communications

File name: 310732mi1010.pdf

**Upper Peninsula Telephone Company
Line 1010 – Voice Services Rate Comparability**

As required in 47 C.F.R. § 54.313(a)(10), any recipient of high-cost support shall provide a letter certifying that the pricing of the company's voice services is no more than two standard deviations above the applicable national average urban rate for voice services, as specified in the most recent public notice issued by the Wireline Competition Bureau and Wireless Telecommunications Bureau. The following provides the Company's support for Line 1010 - Description of Voice Service Rate Comparability.

As of January 1, 2014, the Company charges the following fixed voices prices:

Flat Rate Residential Service	\$25.50
State Residential Subscriber Line Charge	0.00
State Universal Service Charge Fee	0.00
Mandatory Extended Area Service	0.00
Residential Federal Subscriber Line Charge	<u>6.50</u>
Total Residential Fixed Voice Charges	<u>\$32.00</u>

Since the total for residential fixed voice that the Company charges, as shown above, is below the \$46.96, which is two standard deviations above the applicable national average urban rate for voice services, announced by the FCC Wireline Competition Bureau in the Public Notice released on March 20, 2014 (DA 14-384), the Company hereby certifies that it is in compliance with 47 C.F.R. § 54.313(a)(10).

UPPER PENINSULA TELEPHONE COMPANY LIFELINE SERVICE TERMS AND CONDITIONS

A. DESCRIPTION

1. Lifeline Service applies discounts to monthly recurring rates for qualifying residential customers. These discounts are applied to existing tariffed rates and charges for residential telephone service. The Company's voice Lifeline plan includes unlimited local minutes-of-use within the toll-free calling area. Residential customers are allowed 2,000 minutes of calling into their expanded local calling areas (adjacent exchanges) free of charge each month. Each minute after that is charged at \$0.05 per minute.
2. In order to be eligible for Lifeline Service a residential customer's household income must be at or below 150% of the poverty level as determined by the U.S. Department of Health and Human Services and as approved by the State Treasurer, or the customer must participate in one of the following federal assistance programs:
 - a. Medicaid
 - b. Supplemental Nutrition Assistance Program (SNAP) - Food stamps
 - c. Supplemental security income (SSI)
 - d. Federal public housing assistance/Section 8
 - e. Low-income home energy assistance program (LIHEAP)
 - f. National school lunch program's free lunch program
 - g. Temporary assistance for needy families (TANF) aka Family Independence Program
3. Other services can be provided with the Lifeline Service at applicable rates and charges.
4. Proof of eligibility will be required for all initial applicants and all Lifeline recipients will be required to re-certify every year.

B. REGULATIONS

1. Regulations specified elsewhere in the Company's tariffs apply to Lifeline Service.
2. Lifeline Service is only available with residence services, excluding foreign exchange service. Lifeline Service is limited to one line per household at the customer's primary residence.
3. A miscellaneous service charge does not apply when Lifeline Service is added or discontinued to existing service when that is the only work being done.
4. a. The discount on the monthly rate for qualified Lifeline customers shall be \$11.25. Credits are applied to the end user's basic local exchange service. At no time shall the total Lifeline credit exceed the sum of the end user common line charge and the basic local exchange rate. The discount on the monthly rate for qualified Lifeline customers 65 years of age or more shall be \$12.35. At no time shall the total Lifeline credit exceed the sum of the end user common line charge and the basic local exchange rate. Qualified participants on tribal lands will receive, in addition to the discounts listed above, an additional federal approved reduction of up to \$25.00 applied to the monthly local service rate.
 - b. The Company will provide, at the qualifying customer's option, toll blocking service at no charge. Toll blocking is defined as a central office service that restricts access to the network. Toll blocking is provided where facilities permit and will not allow 1+, 0+, 0-, 101XXXX, 900, or interzone calls to be completed. Toll blocking does not restrict local

calls, calls to intraNPA directory assistance, telephone repair service, 911, or calls to 800 or 950 numbers.

- c. The Company will not require a service deposit in order to initiate Lifeline Service if the qualifying customer voluntarily elects toll blocking service.
 - d. Participants in Lifeline shall not be disconnected from local service for non-payment of toll charges. In addition, the Company will not deny reestablishment of local service to customers who are eligible for Lifeline and have previously been disconnected for non-payment of toll charges.
5. The Lifeline plan will apply after receipt and processing of a completed company or community/government-provided application, including documentation indicating that the household income meets the eligibility standards established above.
 6. Customers of Lifeline Service must notify the Company of any changes which would affect qualification. Re-certification of eligibility will take place on an ongoing basis. When the customer is no longer eligible for Lifeline Service, the Lifeline discount would be discontinued and regular tariff rates and charges would apply.

C. TRIBAL LINK UP PROGRAM

1. A discount on the line connection charge specified elsewhere in this tariff is also available to qualifying customers for the installation or transfer of service from one residential premises to another.
 - a. A qualifying customer may receive a 100% reduction in the installation charges, or transfer of service charges for connection at the customer's principal place of residence.
 - b. A qualifying customer may then make payments for the connection charges on a deferred schedule in which the qualifying customer does not pay interest. The interest charges not charged to the qualifying customer shall be for connections charges of up to \$200.00 that are deferred for a period not to exceed one year. Charges assessed for installation or transfer of service include any charges that the Company customarily assesses to connect subscribers to the network. These charges do not include any permissible security deposit requirements.
 - c. A qualifying customer can receive the benefits of the Tribal Link Up Program for a second and subsequent time only for a principal place of residence with an address different from the residence address at which the Link Up assistance was provided previously.

D. ELIGIBLE RESIDENTS OF TRIBAL LANDS

Applicants residing on Tribal lands referenced in Title 25 Code of Federal Regulations, Section 20.1, paragraph (v) may qualify for Lifeline service in accordance with the qualification criteria contained on Sheet 25, or if they participate in one of the following federal programs:

- a. Bureau of Indian Affairs general assistance
- b. Tribally administered Temporary Assistance for Needy Families
- c. Head Start (must meet income qualifying standard of program)
- d. Food Distribution Program on Indian Reservations

An applicant residing on Tribal lands must certify under penalty of perjury that he/she resides on a reservation as defined in Title 25 Code of Federal Regulations, Section 20.1, paragraph (v) and meets at least one of the qualification criteria. The Tribal lands applicant also must agree to notify the Company if he or she ceases to qualify as an eligible resident of Tribal lands.