



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 30, 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 Ardmore Telephone Company, Inc.
Study Area Code 290280**

Dear Ms. Dortch:

On behalf of Ardmore Telephone Company, Inc. (“Ardmore”), 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 Ardmore 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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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 Ardmore Telephone Company, Inc.
Study Area Code 290280
Request for Confidentiality**

Dear Ms. Dortch:

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

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

¹ 47 C.F.R. §§ 0.457, 0.459.

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

³ 47 C.F.R. §§ 54.313, 54.422.

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

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

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

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

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

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

the attachment under seal. The Company uses the information contained in the Five-Year Plan to ensure that its customers continue to receive state-of-the-art high quality telecommunications and broadband services that the Company has been providing to them for many years as well as to satisfy mandatory reporting requirements and does not share the information for which protection is sought. The Company protects the secrecy of this information with a security protocol that ensures the information is not inadvertently disclosed or disseminated. Only directors, managers and employees with a direct need to know are authorized to access the information.

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

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

Please contact the undersigned with any questions regarding this request.

Sincerely,



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

<010> Study Area Code	290280
<015> Study Area Name	ARDMORE TEL CO
<020> Program Year	2015
<030> Contact Name: Person USAC should contact with questions about this data	Todd Crandall
<035> Contact Telephone Number: Number of the person identified in data line <030>	2708569983 ext.
<039> Contact Email Address: Email of the person identified in data line <030>	tcrandall@tmsvcs.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="290280TN510.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="290280TN610.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 checked="" type="checkbox"/>	<input type="checkbox"/>
<3005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

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

<010> Study Area Code 290280
 <015> Study Area Name ARDMORE TEL CO
 <020> Program Year 2015
 <030> Contact Name - Person USAC should contact regarding this data Todd Crandall
 <035> Contact Telephone Number - Number of person identified in data line <030> 2708569983 ext.
 <039> Contact Email Address - Email Address of person identified in data line <030> torandall@tmsvcs.com

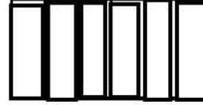
<110> Has your company received its ETC certification from the FCC? (yes / no)
 If your answer to Line <110> is yes, do you have an existing §54.202(a) "5
 year plan" filed with the FCC? (yes / no)

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.

290280TNI112.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	290280
<015>	Study Area Name	ARDMORE TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Todd Crandall
<035>	Contact Telephone Number - Number of person identified in data line <030>	270856983 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tcrandall@tmsvcs.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 290280

<015> Study Area Name ARDMORE TEL CO

<020> Program Year 2015

<030> Contact Name - Person USAC should contact regarding this data Todd Crandall

<035> Contact Telephone Number - Number of person identified in data line <030> 2708569983 ext.

<039> Contact Email Address - Email Address of person identified in data line <030> tcrandall@tmsvcs.com



<1210> Terms & Conditions of Voice Telephony Lifeline Plans

<1220> Link to Public Website

HTTP <http://ardmore.net/userfiles/media/lifeline.jpg>

<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	290280
<015>	Study Area Name	ARDMORE TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Todd Crandall
<035>	Contact Telephone Number - Number of person identified in data line <030>	2708569983 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tcrandall@tmsvcs.com

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

<2010>	Incremental Connect America Phase I reporting	<input type="checkbox"/>
<2011>	2nd Year Certification [47 CFR § 54.313(b)(1)]	<input type="checkbox"/>
<2011>	3rd Year Certification [47 CFR § 54.313(b)(2)]	<input type="checkbox"/>
<2012>	Price Cap Carrier Receiving Frozen Support Certification [47 CFR § 54.312(a)]	<input type="checkbox"/>
<2013>	2013 Frozen Support Certification	<input type="checkbox"/>
<2014>	2014 Frozen Support Certification	<input type="checkbox"/>
<2014>	2015 Frozen Support Certification	<input type="checkbox"/>
<2015>	2016 and future Frozen Support Certification	<input type="checkbox"/>
<2016>	Price Cap Carrier Connect America ICC Support [47 CFR § 54.313(d)]	<input type="checkbox"/>
<2016>	Certification Support Used to Build Broadband	<input type="checkbox"/>
<2017>	Connect America Phase II Reporting [47 CFR § 54.313(e)]	<input type="checkbox"/>
<2018>	3rd year Broadband Service Certification	<input type="checkbox"/>
<2018>	5th year Broadband Service Certification	<input type="checkbox"/>
<2019>	Interim Progress Certification	<input type="checkbox"/>
<2020>		<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 290280
<01S> Study Area Name ARDMORE TEL CO
<02D> Program Year 2015
<03D> Contact Name - Person USAC should contact regarding this data Todd Crandall
<03S> Contact Telephone Number - Number of person identified in data line <03D> 2708569983 ext.
<039> Contact Email Address - Email Address of person identified in data line <03D> tcrandall@tmsvcs.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)		<input type="checkbox"/>	Name of Attached Document Listing Required Information
(3012)	Community Anchor Institutions (47 CFR § 54.313(f)(1)(iii))	<input type="checkbox"/>	
(3013)	Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))	<input type="checkbox"/>	Name of Attached Document Listing Required Information (Yes/No)
(3014)	If yes, does your company file the RUS annual report	<input type="checkbox"/>	(Yes/No)
(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)	<input type="checkbox"/>	
(3016)		<input type="checkbox"/>	
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	<input type="checkbox"/>	Name of Attached Document Listing Required Information (Yes/No)
(3018)	If the response is no on line 3014, is your company audited?	<input type="checkbox"/>	(Yes/No)
(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	<input checked="" type="checkbox"/>	
(3020)	Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications	<input checked="" type="checkbox"/>	
(3021)	Management letter issued by the independent certified public accountant that performed the company's financial audit.	<input checked="" 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,	<input type="checkbox"/>	
(3023)	Underlying information subjected to a review by an independent certified public accountant	<input type="checkbox"/>	
(3024)	Underlying information subjected to a review by an officer certification.	<input type="checkbox"/>	
(3025)		<input type="checkbox"/>	
(3026)	Attach the worksheet listing required information	<input type="checkbox"/>	Name of Attached Document Listing Required Information

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	290280
<015>	Study Area Name	ARDMORE TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Todd Crandall
<035>	Contact Telephone Number - Number of person identified in data line <030>	2708569983 ext .
<039>	Contact Email Address - Email Address of person identified in data line <030>	tcrandall@tmsvcs.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Certification - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	290280
<015>	Study Area Name	ARDMORE TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Todd Crandall
<035>	Contact Telephone Number - Number of person identified in data line <030>	2708569983 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tcrandall@tmsvcs.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>ARDMORE TEL CO</u>	
Signature of Authorized Officer: <u>CERTIFIED ONLINE</u>	Date: <u>06/27/2014</u>
Printed name of Authorized Officer: <u>Trevor Bonnstetter</u>	
Title or position of Authorized Officer: <u>CEO</u>	
Telephone number of Authorized Officer: <u>2708561000 ext.</u>	
Study Area Code of Reporting Carrier: <u>290280</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>ARDMORE TEL CO</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>Mark A. Ozanick</u>	
Title or position of Authorized Agent or Employee of Agent: <u>Staff Consultant</u>	
Telephone number of Authorized Agent or Employee of Agent: <u>7705692105 ext.</u>	
Study Area Code of Reporting Carrier: <u>290280</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

REDACTED – FOR PUBLIC INSPECTION

ARDMORE TELEPHONE COMPANY (SAC 290280)

ATTACHMENT - LINE 112

FIVE YEAR SERVICE QUALITY IMPROVEMENT PLAN

ATTACHMENT REDACTED IN ENTIRETY

Ardmore Telephone Company, Inc.’s demonstration of complying with applicable service quality standards and consumer protection rules for voice and broadband services:

In establishing this certification in its *2005 ETC Order*,¹ the FCC found that an ETC must make “a specific commitment to objective measures to protect consumers.”² The 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

Ardmore Telephone Company, Inc. (“Ardmore”) hereby certifies that it is in compliance with applicable service quality standards and consumer protection rules. Ardmore is subject to consumer protection obligations under Tennessee state law. These obligations include, but are not limited to, the following: (1) filing a Local Exchange Tariff pursuant to the Rules of the Tennessee Regulatory Authority (“TRA”), Chapter 1220-4-1-.03 and the Tennessee Code Annotated, Title 65, Chapter 5, Part 1, §65-5-102, which discloses rates, terms and conditions of service to customers; (2) adherence to state consumer protection requirements governing telephone providers which require implementation of Basic Utility Obligations in accordance with the Rules of the Tennessee Regulatory Authority, Chapter 1220-4-2-.29, Consumer Safeguards as identified in the

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.

Rules of the Tennessee Regulatory Authority, Chapter 1220-4-2-.55, anti-slamming procedures as required in the Rules of the Tennessee Regulatory Authority, Chapter 1220-4-2-.56; (3) truth-in-billing requirements in accordance with the Rules of the Tennessee Regulatory Authority, Chapter 1220-4-2-.58; and (4) CPNI, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

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

Ardmore Telephone Company, Inc.’s demonstration of complying with applicable service quality standards and consumer protection rules for voice and broadband services:

In establishing this certification in its *2005 ETC Order*,¹ the FCC found that an ETC must make “a specific commitment to objective measures to protect consumers.”² The 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

Ardmore Telephone Company, Inc. (“Ardmore”) hereby certifies that it is in compliance with applicable service quality standards and consumer protection rules. Ardmore is subject to consumer protection obligations under state law. These obligations include, but are not limited to, the following: (1) filing a Local Exchange Tariff pursuant to the requirements of the Alabama Public Service Commission’s Rules and Regulations, Telephone Rules, Rule T-12, Filing of Telephone Tariffs and The Code of Alabama 1975 Section 37-1-81, which disclose rates, terms and conditions of service to customers; (2) adherence to state consumer protection requirements governing telephone providers which require adherence to minimum service standards as identified in the Alabama Public Service Commission’s Rules and Regulations, Telephone Rules,

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.

Ardmore Telephone Company’s demonstration of ability to function in emergency situations for voice and broadband services:

Ardmore Telephone Company, Inc. (“Ardmore”) 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 Rules of the Tennessee Regulatory Authority, Chapter 1220-4-2. Ardmore’s network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). Ardmore can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow Ardmore to manage traffic spikes throughout its network, as emergency situations require. In addition, Ardmore has redundancy for connectivity purposes *via* additional routes and electronic equipment for voice and broadband services.

In accordance with the Rules of Tennessee Regulatory Authority, Chapter 1220-4-2-.23 Emergency Operation, Ardmore’s central offices have adequate provision for emergency power. 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. Ardmore has battery backup at all office locations and in its electronic equipment sites. Length of run time is determined by the equipment serving the area and the number of customers working out of the equipment. Generators are installed at all Central Office locations. They will continue to run as long as Ardmore has access to fuel.

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

Ardmore Telephone Company’s demonstration of ability to function in emergency situations for voice and broadband services:

Ardmore Telephone Company, Inc. (“Ardmore”) 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 the Alabama Public Service Commission Rules and Regulations, Telephone Rules. The Company’s network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). Ardmore can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow Ardmore to manage traffic spikes throughout its network, as emergency situations require. In addition, Ardmore has redundancy for connectivity purposes *via* additional routes and electronic equipment for voice and broadband services.

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

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

Rule T-21, protection against cramming and other deceptive practices as identified in Rule T-16(C)(11); (3) truth-in-billing requirements as identified in Rule T-16; and (4) CPNI, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

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

Lifeline Enrollment Eligibility Qualifications

In 2013 Ardmore Telephone Co. began preparation to be enrolled in the National Lifeline Accountability Database (NLAD) administered by USAC. We are using the following guidelines to enroll customers into the Lifeline assistance program. Customers who apply for Ardmore Telephone Co. service are provided a standard residential service. The standard residential service is unlimited local calling and does not allow calls to be made that will incur additional charges to the customer. Customers wishing to have access to long distance network are required to pay a \$100.00 security deposit.

1. Medicaid
2. Supplemental Nutrition Assistance Program (Food Stamps or SNAP)
3. Supplemental Security Income (SSI)
4. Federal Public House Assistance (Section 8)
5. Low-Income Home Energy Assistance Program (LIHEAP)
6. Temporary Assistance to Needy Families (TNAF)
7. National School Lunch Program's Free Lunch Program
8. Bureau of Indian Affairs General Assistance
9. Tribally-Administered Temporary Assistance for Needy Families (TTANF)
10. Food Distribution Program on Indian Reservations (FDPIR)
11. Head Start
12. State Assistance Programs (If Applicable)
13. Eligibility Based on Income
14. Program Eligibility Approved by State Administrator

Do you need help paying for Telephone Service?



Do you or someone in your household participate in any of these programs?

Alabama criteria:

- Medicaid
- Low Income Home Energy Assistance Program (LIHEAP)
- Supplemental Security Income (SSI)
- Temporary Assistance for Needy Families (TANF)
- National School Lunch Program (NSL) free school lunch program
- Household Income at or below 135% of the federal poverty guidelines
- SNAP (Supplemental Nutrition Assistance Program, formerly known as Food Stamps)
- Section 8 Federal Public Assistance (FPHA) (Section 8 only HUD or other federal programs may not automatically qualify)

How do I know whether I am eligible?

You are eligible for telephone service discounts under a "Lifeline" program, and for free Toll Limitation Service (TLS) if you participate in one of these programs; provided that you do not receive any similar discounts for cellular telephone service.



What type of discount is available?

Lifeline assistance lowers the cost of basic monthly local telephone service. Eligible consumers can receive a \$9.25 Federal Lifeline Credit plus a \$3.50 State Lifeline Credit on their bill.

Toll Limitation Service (TLS) support allows eligible consumers who wish to avoid incurring large long distance fees to choose toll blocking or toll control at no cost.

For a complete set of terms for the Lifeline program, call or visit your local telephone office. Lifeline is part of the Federal Universal Service Fund program. The Federal Communications Commission introduced this, and the Universal Service Administrative Company oversees it. The goal of Universal Service is to make sure consumers throughout the United States have essential telecommunications service.

You may also call the Alabama Public Service Commission toll free at 1.800.882.3919





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Limestone County

Basic Telephone - \$15.73

Please call the business office at **256-423-2131**
or e-mail ardcustrep@ardmore.net for more information.

To report trouble after hours, please call **256-423-2122**.

Questions about additional monthly fees? [Click here!](#)

[Lifeline Information](#)

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Madison County

Basic Telephone - \$16.30

Please call the business office at **256-423-2131**
or e-mail ardcustrep@ardmore.net for more information.

To report trouble after hours, please call **256-423-2122**.

Questions about additional monthly fees? [Click here!](#)

[Lifeline Information](#)

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Giles and Lincoln Counties

Basic Telephone - \$9.61

Please call the business office at **256-423-2131**
or e-mail ardcustrep@ardmore.net for more information.

To report trouble after hours, please call **256-423-2122**.

Questions about additional monthly fees? [Click here!](#)

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BASIC LOCAL EXCHANGE SERVICE

S2.15 LIFELINE ASSISTANCE PROGRAM

(N)

1. General

Lifeline Assistance reduces an eligible customer's monthly rates for local service. The total monthly credit to the local telephone service bill of qualified residential subscribers consists of a federal credit totaling no more than \$9.25. The credits are applied to the local service bills for qualified recipients of low income assistance programs who are eligible and apply for the credits. Lifeline Assistance may be applied to a maximum of one line per eligible customer.

2. Regulations

- a. Persons wishing to qualify for the credit must meet state certification criteria for eligibility. This credit is available only to residence customers. Eligibility is determined by participation in one of the below programs, or by having a household income at or below 135% of the federal poverty level.
 - i. Medicaid
 - ii. Food Stamps
 - iii. Supplemental Social Security
 - iv. Federal Public Housing Assistance
 - v. Low Income Home Energy Assistance Program
 - vi. National School Free Lunch Program
 - vii. Temporary Assistance for Needy Families
- b. All applicants for this service are subject to verifications of eligibility with the state agencies responsible for administration of the qualifying programs, or in the alternative provide adequate documentation to WK&T. WK&T will inspect but not retain a copy of those documents.
- c. The Company will periodically reconcile and confirm the continuing eligibility of Lifeline Assistance recipients with the appropriate state agencies and through surveys requiring customers to verify their continuing eligibility for Lifeline Assistance. Upon a determination of ineligibility, the Company will contact the customer and request documentation of eligibility. If the customer can not provide such documentation within sixty (60) days from the date of such request, the credit will be discontinued on the bill after written notification to the customer. All unresolved disputes regarding eligibility shall be brought to the attention of the Commission for resolution.

General Subscriber Services Tariff

Ardmore Telephone Company - Tennessee Section 3
Original Sheet 5.2

- d. The Company will process all applications and apply the appropriate credit on the customer's next monthly bill. A secondary service charge is not applicable for existing customers who subscribe to Lifeline Assistance. (N)
 - e. 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
 - f. Local service deposit requirements will be waived for customers who voluntarily receive Toll Limitation Service.
 - g. Participants in Lifeline Assistance shall not be disconnected from Local Service for nonpayment 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 nonpayment of toll charges. The Company may require customers whose households are otherwise eligible who have previously unpaid toll charges to subscribe to toll blocking prior to being accepted as eligible for Lifeline service. Lifeline Assistance will not be connected if an outstanding balance is owed by the customer for local service.
 - h. Partial payments that are received from Lifeline customers will first be applied to local service charges and then to any outstanding toll charges.
 - i. One low income credit is available per household and is applicable to the primary residential connection only.
 - j. A Lifeline customer may subscribe to any local service offering available to other residential customers.
 - k. The customer must also certify that no other person at the address on the service order below is receiving any other Lifeline benefits.
 - l. The customer is to immediately inform the Company upon the cessation of any eligibility.
3. Credits
- 1. The customer will receive a \$9.25 monthly credit for local exchange telephone service. (R)
 - 2. All other customary rates, taxes, and other taxes apply.

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ARDMORE TELEPHONE COMPANY (SAC 290280)

ATTACHMENT - LINE 3026

ATTACHMENT REDACTED IN ENTIRETY