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July 1, 2014

Via Hand Delivery

Ms. Marlene Dortch  
Federal Communications Commission  
445 12th Street SW  
Washington, D.C. 20554

Re: FCC Form 481 - High-Cost Support Information and Low-Income Support Information  
Pursuant to 47 C.F.R. §§ 54.313(a)-(g) and 54.422(a)

Dear Secretary Dortch:

Pursuant to 47 C.F.R. §§ 54.313(a)-(g) and 54.422(a) of the Federal Communication Commission's regulations, please find enclosed the FCC Form 481 for Bush-Tell, Inc. This form was also filed at the Regulatory Commission of Alaska (RCA) and USAC.

Bush-Tell, Inc. seeks confidential treatment for its financial information pursuant to the Protective Order, Connect America Fund, et al., WC Docket No. 10-90 et al., (Nov. 16, 2012). A 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 47 C.F.R. §§ 0.457 and 0.459 of the initial § 54.202(a) Five-Year Service Quality Improvement Plan.

Please do not hesitate to contact me if you have any questions or I may be of any assistance.

Sincerely,

**DYKEMA GOSSETT PLLC**

Shannon M. Heim  
4000 Wells Fargo Center  
90 South Seventh Street  
Minneapolis, MN 55402  
Phone (612) 486-1586  
Fax: (855) 223-7059  
Email: sheim@dykema.com

SMHE/ebl  
Enclosure



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Via Hand Delivery

Ms. Marlene Dortch, Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington, D.C. 20554

Re: FCC Form 481 - High-Cost Support Information and Low-Income Support Information  
Pursuant to 47 C.F.R. §§ 54.313(a)-(g) and 54.422(a)

Dear Ms. Dortch:

Pursuant to the Protective Order in *Connect America Fund, et al.*, WC Docket No. 10-90 *et al.* (Nov. 16, 2012) and 47 C.F.R. §§ 0.457 and 0.459, Bush-Tell, Inc., by its attorneys, hereby requests that certain materials and information be withheld from public inspection. Specifically, Bush-Tell, Inc. requests confidential treatment of the Five-Year Service Quality Improvement Plan (the "Plan") attached to its Form 481 filing.

In support of its request for confidential treatment and pursuant to the requirements under 47 C.F.R. § 0.459(b), Bush-Tell, Inc. states the following:

*1. Identification of the specific information for which confidential treatment is sought.*

Bush-Tell, Inc. seeks confidential treatment of the Plan attached to the Form 481 filing accompanying this letter. The Plan contains sensitive financial information about Bush-Tell, Inc. as well as information about Bush-Tell, Inc.'s projected network improvements and upgrades for voice and broadband services during the period from 2015 through 2019.

*2. Identification of the Commission proceeding in which the information was submitted or description of the circumstances giving rise to the submission.*

The documents are being submitted as part of the annual Eligible Telecommunications Carrier ("ETC") Report (Form 481) mandated by 47 C.F.R. § 54.313.

Ms. Marlene Dortch, Secretary  
July 1, 2014  
Page 2

3. *Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged.*

The data described is highly confidential and sensitive commercial and financial information which constitutes trade secrets or sensitive commercial and financial information that would “customarily be guarded from competitors”<sup>1</sup> and is therefore exempted from mandatory disclosure under FOIA Exemption 4 and 47 C.F.R. § 0.457(d).<sup>2</sup>

4. *Explanation of the degree to which the information concerns a service that is subject to competition.*

The Plan relates to voice and broadband services provided by Bush-Tell, Inc. that are subject to competition from competitive local exchange carriers, cable television system operators, electric power utilities, fixed and mobile wireless service providers, and/or satellite carriers.

Specifically, the Plan sets forth in detail the services provided by Bush-Tell, Inc. over its existing network including location of customers, as well as planned network improvement and maintenance for 2015 through 2019, including project dates, populations impacted by the improvements and upgrades, and projected capital costs associated with maintaining the network. This information is competitively sensitive information related to the company’s existing network and planned upgrades and maintenance, and would benefit Bush-Tell, Inc.’s competitors if they were able to have access to this information.

5. *Explanation of how disclosure of the information could result in substantial competitive harm.*

Disclosure of the Plan is likely to result in substantial competitive harm to Bush-Tell, Inc. because the Plan could provide competitors with commercially sensitive insights related to Bush-Tell, Inc.’s operations, service offerings, and costs.

6. *Identification of any measures taken by the submitting party to prevent unauthorized disclosure.*

Bush-Tell, Inc. does not make the Plan or any of the information contained therein publically available in any way. The Plan is only made available to key employees with a direct need-to-know basis. This production has been completed by outside counsel.

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<sup>1</sup> 47 C.F.R. § 0.457(d)(2).

<sup>2</sup> 5 U.S.C. § 522(b)(4).

Ms. Marlene Dortch, Secretary  
July 1, 2014  
Page 3

7. *Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties.*

Bush-Tell, Inc. does not make the Plan available to the public and it has not previously allowed disclosure of the Plan to third parties that are not otherwise bound by confidentiality obligations.

8. *Justification of the period during which the submitting party asserts that the material should not be available for public disclosure.*

The Plan should be treated as confidential for an indefinite period, as Bush-Tell, Inc. will always be subject to competition and the competitive harms associated with the disclosure of the Plan.

9. *Any other information that the party seeking confidential treatment believes may be useful in assessing whether its request for confidentiality should be granted.*

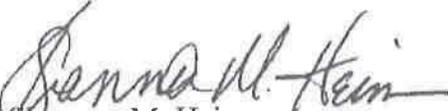
None.

In order to provide adequate protection from public disclosure, Bush-Tell, Inc. requests that the Commission strictly limit distribution of the Plan within the Commission on a "need to know" basis and not allow any distribution outside of the Commission. In the event that any person or entity outside of the Commission requests disclosure of the Plan, Bush-Tell, Inc. requests that it be so notified immediately so that it can oppose such request or take other action to safeguard its interests as it deems necessary and appropriate.

Please do not hesitate to contact me if you have any questions or I may be of any assistance.

Sincerely,

**DYKEMA GOSSETT PLLC**

  
Shannon M. Heim

SMHE/ebl

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

FCC Form 481  
OMB Control No. 3060-0086/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	613004
<015>	Study Area Name	BUSH-TELL INC.
<020>	Program Year	2015
<030>	Contact Name: Person USAC should contact with questions about this data	Michael C Burke
<035>	Contact Telephone Number: Number of the person identified in data line <030>	9074400540 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	michael.burke@acsalaska.net

<b>ANNUAL REPORTING FOR ALL CARRIERS</b>	<b>54.313</b>	<b>54.422</b>
	<b>Completion Required</b>	<b>Completion Required</b>

<100>	Service Quality Improvement Reporting	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<200>	Outage Reporting (voice)	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>
<210>	Unfulfilled Service Requests (voice)	0	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<310>	Detail on Attempts (voice)	(attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>
<320>	Unfulfilled Service Requests (broadband)	0	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<330>	Detail on Attempts (broadband)	(attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>
<400>	Number of Complaints per 1,000 customers (voice)			
<410>	Fixed	0.0	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<420>	Mobile	0.0	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<430>	Number of Complaints per 1,000 customers (broadband)		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<440>	Fixed	0.0	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<450>	Mobile	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 type="checkbox"/>
<510>	613004AK510.pdf	(attached descriptive document)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<600>	Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<610>	613004AK610.pdf	(attached descriptive document)	<input checked="" type="checkbox"/>	<input 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)?	(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>	613004AK1010.pdf	(attach descriptive document)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1100>	Terrestrial Backhaul (Y/N)?	(if not, check to indicate certification)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1110>	Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>

<b>Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet</b>				
<i>Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers</i>				
<2000>		(check to indicate certification)	<input type="checkbox"/>	<input type="checkbox"/>
<2005>		(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>
<b>Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet</b>				
<3000>	REDACTED - FOR PUBLIC INSPECTION	(certification)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<3005>		(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>

<b>(100) Service Quality Improvement Reporting</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	613006
<015>	Study Area Name	BUSH-TELE INC.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Michael C Burke
<035>	Contact Telephone Number - Number of person identified in data line <030>	9074400540 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	michael.burke@acsalaska.net

<110>	Has your company received its ETC certification from the FCC?	(yes / no) <input type="radio"/> <input checked="" type="radio"/>
<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) <input type="radio"/> <input type="radio"/>

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**

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

<010> Study Area Code 613004  
 <015> Study Area Name BUSH-TELL INC.  
 <020> Program Year 2015  
 <030> Contact Name - Person USAC should contact regarding this data Michael C Burke  
 <035> Contact Telephone Number - Number of person identified in data line <030> 9074400940 ext.  
 <039> Contact Email Address - Email Address of person identified in data line <030> michael.burke@acwialaska.net

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

Alaska

<920> Tribal Government Engagement Obligation

613004AR920.pdf

Name of Attached Document

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

- <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.

Select (Yes, No, NA)
Yes
Yes

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

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

<010>	Study Area Code	613004
<015>	Study Area Name	BUSH-TELL INC.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Michael C Burke
<035>	Contact Telephone Number - Number of person identified in data line <030>	9074400340 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	michael.burke@acsalaska.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)

<b>(1200) Terms and Condition for Lifeline Customers</b> <b>Lifeline</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	613004
<015>	Study Area Name	BUSH-TELL INC.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Michael C Burke
<035>	Contact Telephone Number - Number of person identified in data line <030>	9074400540 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	michael.burke@acsalaska.net

<1210> Terms & Conditions of Voice Telephony Lifeline Plans



Name of Attached Document

<1220> Link to Public Website

HTTP <http://www.bush-tell.com/home>

"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.

<b>(2000) Price Cap Carrier Additional Documentation</b> Data Collection Form Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	613004
<015>	Study Area Name	BUSH-TELL INC.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Michael C Burke
<035>	Contact Telephone Number - Number of person identified in data line <030>	9074400540 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	michael.burke@acsalaak.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

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

<010> Study Area Code	613004
<015> Study Area Name	BVSH-TELL INC.
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Michael C Burke
<035> Contact Telephone Number - Number of person identified in data line <030>	9074400540 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	michael.burke@csaalaska.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)(i))

Name of Attached Document Listing Required Information

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

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

Name of Attached Document Listing Required Information

(3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))   
 (3014) If yes, does your company file the RUS annual report

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

(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)   
 (3016) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

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

613004AR3017.pdf, 613004AR3017.xlsx

Name of Attached Document Listing Required Information

(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

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

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

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

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

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

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

(3024) Underlying information subjected to an officer certification.

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

(3026) Attach the worksheet listing required information

Name of Attached Document Listing Required Information

REDACTED - FOR PUBLIC INSPECTION

<b>Certification - Reporting Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	613004
<015>	Study Area Name	BUSH-TELE INC.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Michael C Burke
<035>	Contact Telephone Number - Number of person identified in data line <030>	9074400540 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	michael.burke@csalaska.net

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

<b>Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients</b>	
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. 56 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

<b>Certification - Agent / Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3050-0819 July 2013
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<010> Study Area Code	613004
<015> Study Area Name	BUSH-TELL INC.
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Michael C Burke
<035> Contact Telephone Number - Number of person identified in data line <030>	9074400540 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	michael.burke@acsaluska.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) <u>Michael C Burke</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:	Michael C Burke
Name of Reporting Carrier:	BUSH-TELL INC.
Signature of Authorized Officer:	CERTIFIED ONLINE Date: 06/26/2014
Printed name of Authorized Officer:	Harry Collier Jr
Title or position of Authorized Officer:	President/General Manager
Telephone number of Authorized Officer:	9076754311 ext.
Study Area Code of Reporting Carrier:	613004 Filing Due Date for this form: 07/01/2014
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

**TO BE COMPLETED BY THE AUTHORIZED AGENT:**

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	BUSH-TELL INC.
Name of Authorized Agent or Employee of Agent:	Michael C Burke
Signature of Authorized Agent or Employee of Agent:	CERTIFIED ONLINE Date: 06/26/2014
Printed name of Authorized Agent or Employee of Agent:	Michael C Burke
Title or position of Authorized Agent or Employee of Agent:	Consultant
Telephone number of Authorized Agent or Employee of Agent:	9074400540 ext.
Study Area Code of Reporting Carrier:	613004 Filing Due Date for this form: 07/01/2014
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

## Attachments





Bush-Tell, Inc.:	Bush-Tell, Inc.
Study Area Code	613004
Supplemental Data for:	Line 510-Service Quality Standards and Consumer Protection Rules Compliance

---

Bush-Tell, Inc. will make reasonable efforts to comply with applicable service quality standards as stated in Alaska Administrative Code 3 AAC 53.700 State Telecommunications Modernization Plan and consumer protection rules as defined in 47 C.F.R. Part 64 Subpart U, Customer Proprietary Network Information and the Federal Trade Commission Red Flag rules to prevent identity theft.

Bush-Tell, Inc. adheres to Consumer Protection by complying with the requirements of 47 CFR Part 64 Subpart U, Customer Proprietary Network Information and the Federal Trade Commission Red Flag rules to prevent identity theft. A manual for each of those programs is in place and is part of the employees' handbook. Employee training is conducted annually and new hires are instructed on the programs as required by their job functions.

Bush-Tell, Inc. also adheres to Service Quality Standards by complying with the service standards of the State of Alaska as promulgated in the Alaska Administrative Code 3 AAC 53.700 State Telecommunications Modernization Plan.

#### **RATES AND RATE STABILITY**

New customers are provided rate information at the time they order service. The rate information is prepared based on tariffs which are on file with the state public utility commission and available for inspection at our office. In addition rates are available on Bush-Tell, Inc. website. Notices of rate changes proposed by Bush-Tell, Inc. are communicated to the customers through a bill notice or other comparable means. Bush-Tell, Inc. complies with all state and federal rules applicable to rate changes.

#### **PROVIDE SPECIFIC DISCLOSURES IN ADVERTISING**

In advertising of prices for service plans Bush-Tell, Inc. will disclose material charges and conditions related to the advertised prices and services. This notice will provide the potential customer with, including if applicable and to the extent the advertising medium reasonably allows: (1) whether nonrecurring installation charges would apply; (2) the monthly fee associated with the service; (3) whether any additional taxes, fees or surcharges apply; (3) the terms and conditions related to receiving a product or service for "free;" and (4) whether prices or benefits apply only for a limited time or promotional period and, if so, whether any different fees or charges will apply for the remainder of the contract term.

#### **TRUTH-IN-BILLING**

Bush-Tell, Inc. has long maintained compliance with the FCC's Truth-in-Billing rules as set forth in 47 CFR 64.2401. In part, this requires Bush-Tell, Inc.'s telephone bill must: (1) be accompanied by a brief, clear, non-misleading plain language description of the service or services rendered; (2) identify the service provider associated with each charge; (3) clearly and conspicuously identify any change in service provider; (4) contain full and non-misleading

descriptions of charges; (5) identify those charges for which failure to pay will not result in disconnection of the customer's basic local service; and (6) provide a toll free number for customers to call in order to lodge a complaint or obtain information. Customers' bills will distinguish (1) monthly charges for service and features, and other charges collected and retained by the carrier, from (2) taxes, fees and other charges collected by the carrier and remitted to federal state or local governments. Bush-Tell, Inc. will not label cost recovery fees or charges as taxes.

#### **READYPROVIDE READY ACCESS TO CUSTOMER SERVICE**

Customers and potential customers may access customer service by visiting Bush-Tell, Inc.'s office or by using a toll-free telephone number during normal business hours. Customer service contact information is available at our business office with regular hours posted on the storefront. In addition, this information is available online and on the monthly invoice rendered by Bush-Tell, Inc.

#### **ABIDE BY POLICIES FOR PROTECTION OF CUSTOMER PRIVACY**

Bush-Tell, Inc. complies with all state and federal rules regarding the privacy of customer information. Certification of this compliance is provided annually to the FCC.

#### **RESPONSE TO CONSUMER INQUIRIES AND COMPLAINTS RECEIVED FROM GOVERNMENT AGENCIES**

Bush-Tell, Inc. will respond in writing to state or federal administrative agencies within 30 days of receiving written consumer complaints from any such agency. Should the agency require a shorter interval for response, Bush-Tell, Inc. will use its best efforts to expedite the review of the complaint to provide a response which meets the agency-provided target date.

#### **TERMINATION OF SERVICE**

Bush-Tell, Inc. follows the state public utility commission's rules for termination of service. Service cannot be terminated without advance notice to the customer. If service is being terminated for non-payment, the customer will have the option to establish a payment plan. So long as the customer adheres to the payment plan, service will not be disconnected. Customers may terminate service at any time and for any reason. Bush-Tell, Inc. does not assess any termination penalty and the customer is simply required to pay for the services which were used while the service was provided.

Bush-Tell, Inc.: Bush-Tell, Inc.  
Study Area Code 613004  
Supplemental Data for: Line 610-Description of Functionality in Emergency Situations

---

As an initial point, Bush-Tell, Inc. had no service outages during 2012 which met the FCC's threshold for reporting into the Network Outage Reporting System ("NORS").

Bush-Tell, Inc. engages in preventative maintenance programs which help ensure network reliability in all conditions. This includes regular checks on generators, battery back-up, HVAC infrastructure at central office switches, and tree trimming/removal when trees have the potential to take down telephone lines during events of high wind or heavy snow. Access to critical infrastructure (like central office switches) is limited to essential personnel. Spare equipment is maintained in inventory.

Like most local exchange carriers, Bush-Tell, Inc.'s network consists of electronic switching equipment and a network of fiber optics and copper facilities. Each Bush-Tell community is non-contiguous and is not connected by roads, making redundancy between communities extremely expensive.

From a switching standpoint, Bush-Tell, Inc. has one primary switch in each community it serves. The largest threat to switches is the loss of power. To address this, Bush-Tell, Inc. ensures adequate battery back-up is maintained as well as backup generator capacity at its largest exchanges. The following table shows the available battery backup at each exchange as well as backup generator capacity:

Exchange	Generator	Batteries
Aniak	30KW	12 Hrs
Anvik		8 Hrs
Crooked Creek		8 Hrs
Grayling		8 Hrs
Kalskag	10KW	8 Hrs
Red Devil		8 Hrs
Shageluk		8 Hrs
Stoney River		8 Hrs
Sleet Mute		8 Hrs

In cases of emergency, Bush-Tell, Inc.'s management has contact information for all employees. Depending upon the scope of the emergency, Bush-Tell, Inc. may call-in as many employees as necessary to provide continual telecommunications service. When poles are down from emergencies, the Bush-Tell, Inc. works with other utilities attached to the same poles to expedite the repair or replacement of the infrastructure.

In summation, Bush-Tell, Inc. takes preventative measures to plan for emergency situations and also takes steps to mitigate the risk or duration of such events.

Bush-Tell, Inc.: Bush-Tell, Inc.  
Study Area Code 613004  
Supplemental Data for: Line 920-Tribal Government Engagement Obligation

---

Bush-Tell, Inc. contacted all of the tribal administrators in its service area in order to comply with the Universal Service Transformation Order. Bush-Tell, Inc. contacted the following Traditional Councils by phone to verify the President or Chief and to verify their address. This effort was headed up by Sonya Hill, Bush-Tell's Office Manager and an Alaska Native:

Aniak Traditional Council  
PO Box 349  
Aniak, AK 99557  
President: Wayne Morgan  
Tribal Admin: Laura Simeon  
Ph # 675-4349

Anvik Traditional Council  
PO Box 10  
Anvik, AK 99558  
Chief: Carl Jerue Jr.  
Ph # 663-6346

Holy Cross Tribal Council  
PO Box 89  
Holy Cross, AK 99602  
Chief: Eugene and Tessie Paul  
Ph # 476-7207

Shageluk IRA (Indian Reorganization Act.)  
PO Box 35  
Shageluk, AK 99665  
Chief: Election to be held 11-8-12  
Ph #473-8239

Grayling IRA (Indian Reorganization Act.)  
PO Box 49  
Grayling, AK 99590  
Chief: Gabriel Nicholi  
Ph # 453-5116

Crooked Creek Traditional Council  
PO Box 69  
Crooked Creek, AK 99575  
President: Evelyn Thomas  
Ph # 432-2200

Sleetmute Traditional Council  
PO Box 109  
Sleetmute, AK 99668  
President: Sophie Gregory  
Ph # 449-4263

Stony River Traditional Council  
PO Box SRV  
Stony River, AK 99557  
President: Mary Willis  
Ph # 537-3258

Village of Upper Kalskag  
PO Box 50  
Upper Kalskag, AK 99607  
President: Elections held on Oct. 1<sup>st</sup>  
Tribal Admin: Bonnie Perrson  
Ph # 471-2322

Village of Lower Kalskag  
PO Box 27  
Lower Kalskag, AK 99626  
President: Nastasia Levi  
Ph # 471-2300

Red Devil Traditional Council  
PO Box 27  
Red Devil, AK 99656  
President: No Council at this time.  
Tried and was unable to contact anyone.

Each tribal administrator was informed of Bush-Tell Inc.'s responsibility to work with all tribal offices regarding a variety of topics, and that Bush-Tell, Inc. would be sending out a letter describing those responsibilities. Specifically, Bush-Tell, Inc. informed each entity its intent to have discussions including (i) A needs assessment and deployment planning with a focus on Tribal community anchor institutions; (ii) Feasibility and sustainability planning; (iii) Marketing

services in a culturally sensitive manner; (iv) Rights of way processes, land use permitting, facilities siting, environmental and cultural preservation review processes; and (v) Compliance with Tribal business and licensing requirements. Face to face meetings with each entity were conducted by Doug DeVore, Bush-Tell, Inc.'s Vice President/Assistant General Manager, and Sonya Hill, during the fall of 2013. No specific needs were identified for the communities by the native leaders beyond the efforts already being conducted by Bush-Tell to provide broadband service to the communities.

Bush-Tell, Inc.:                      Bush-Tell, Inc.  
Study Area Code                      613004  
Supplemental Data for:              Line 1010-Voice Services Rate Compatibility

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Bush-Tell, Inc. certifies that it meets the local voice service rate compatibility requirements. The Residential rate for all Bush-Tell exchanges is \$21.50 a month, which is above the local rate floor of \$20.46 that has been established by the FCC. With state surcharges this rate is \$28.14. The federal \$6.50 SLC brings this residential rate to \$34.64, which is below the two standard deviations from the applicable urban rate for voice service of \$46.96.



USDA-RUS		BORROWER DESIGNATION	
OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS		AKC525	
		PERIOD ENDING December, 2013	
INSTRUCTIONS: See RUS Bulletin 1744-2			
PART B. STATEMENTS OF INCOME AND RETAINED EARNINGS OR MARGINS			
ITEM	PRIOR YEAR	THIS YEAR	
1. Local Network Services Revenues	263,324	246,755	
2. Network Access Services Revenues	1,662,186	1,789,078	
3. Long Distance Network Services Revenues			
4. Carrier Billing and Collection Revenues			
5. Miscellaneous Revenues	112,363	110,829	
6. Uncollectible Revenues		1,815	
7. Net Operating Revenues (1 thru 5 less 6)	2,257,895	2,144,047	
8. Plant Specific Operations Expense	966,211	975,826	
9. Plant Nonspecific Operations Expense (Excluding Depreciation & Amortization)	163,479	156,633	
10. Depreciation Expense	291,092	249,058	
11. Amortization Expense			
12. Customer Operations Expense	73,803	69,374	
13. Corporate Operations Expense	777,607	744,626	
14. Total Operating Expenses (8 thru 13)	2,272,192	2,195,517	
15. Operating Income or Margins (7 less 14)	(14,297)	(50,670)	
16. Other Operating Income and Expenses			
17. State and Local Taxes	(12,511)	(11,060)	
18. Federal Income Taxes	(50,047)	(44,235)	
19. Other Taxes	43	39	
20. Total Operating Taxes (17+18+19)	(62,515)	(55,256)	
21. Net Operating Income or Margins (15+16-20)	48,218	4,586	
22. Interest on Funded Debt	90,429	76,720	
23. Interest Expense - Capital Leases			
24. Other Interest Expense			
25. Allowance for Funds Used During Construction			
26. Total Fixed Charges (22+23+24-25)	90,429	76,720	
27. Nonoperating Net Income	(8,083)	(4,695)	
28. Extraordinary Items			
29. Jurisdictional Differences			
30. Nonregulated Net Income	(26,116)	(1,211)	
31. Total Net Income or Margins (21+27+28+29+30-26)	(86,410)	(78,040)	
32. Total Taxes Based on Income			
33. Retained Earnings or Margins Beginning-of-Year	1,552,892	1,466,482	
34. Miscellaneous Credits Year-to-Date			
35. Dividends Declared (Common)			
36. Dividends Declared (Preferred)			
37. Other Debits Year-to-Date			
38. Transfers to Patronage Capital			
39. Retained Earnings or Margins End-of-Period $[(31+33+34) - (35+36+37+38)]$	1,466,482	1,388,442	
40. Patronage Capital Beginning-of-Year			
41. Transfers to Patronage Capital			
42. Patronage Capital Credits Retired			
43. Patronage Capital End-of-Year (40+41-42)	0	0	
44. Annual Debt Service Payments	318,898	362,506	
45. Cash Ratio $[(14+20-10-11) / 7]$	0.8497	0.8617	
46. Operating Accrual Ratio $[(14+20+26) / 7]$	1.0187	1.0326	
47. TIER $[(31+26) / 26]$	0.0444	-0.0172	
48. DSCR $[(31+28+10+11) / 44]$	0.9254	0.6835	

USDA-RUS

BORROWER DESIGNATION

OPERATING REPORT FOR  
TELECOMMUNICATIONS BORROWERS

AK0525

PERIOD ENDED

December, 2013

INSTRUCTIONS - See help in the online application.

## PART I - STATEMENT OF CASH FLOWS

1.	Beginning Cash (Cash and Equivalents plus RUS Construction Fund)	1,003,006
CASH FLOWS FROM OPERATING ACTIVITIES		
2.	Net income	(78,440)
<i>Adjustments to Reconcile Net Income to Net Cash Provided by Operating Activities</i>		
3.	Add: Depreciation	243,158
4.	Add: Amortization	0
5.	Other (Explain) Corrections: Depreciations 18,721 Accounts Receivable 1800 Advance Bills (913) Other Current (3713)	28,642
<i>Changes in Operating Assets and Liabilities</i>		
6.	Decrease/(Increase) in Accounts Receivable	(61,600)
7.	Decrease/(Increase) in Materials and Inventory	64
8.	Decrease/(Increase) in Prepayments and Deferred Charges	(53,734)
9.	Decrease/(Increase) in Other Current Assets	0
10.	Increase/(Decrease) in Accounts Payable	21,243
11.	Increase/(Decrease) in Advance Billings & Payments	933
12.	Increase/(Decrease) in Other Current Liabilities	396
13.	Net Cash Provided/(Used) by Operations	95,168
CASH FLOWS FROM FINANCING ACTIVITIES		
14.	Decrease/(Increase) in Notes Receivable	0
15.	Increase/(Decrease) in Notes Payable	0
16.	Increase/(Decrease) in Customer Deposits	0
17.	Net Increase/(Decrease) in Long Term Debt (Including Current Maturities)	(276,502)
18.	Increase/(Decrease) in Other Liabilities & Deferred Credits	(945)
19.	Increase/(Decrease) in Capital Stock, Paid-in Capital, Membership and Capital Certificates & Other Capital	0
20.	Less: Payment of Dividends	0
21.	Less: Patronage Capital Credits Retired	0
22.	Other (Explain) Correct other liabilities and deferred credits	1,870
23.	Net Cash Provided/(Used) by Financing Activities	(275,569)
CASH FLOWS FROM INVESTING ACTIVITIES		
24.	Net Capital Expenditures (Property, Plant & Equipment)	(290,411)
25.	Other Long-Term Investments	(14,057)
26.	Other Noncurrent Assets & Jurisdictional Differences	0
27.	Other (Explain) Correct Plant Investment (65492) Plant salvage 3,230 Other long term investment 14,057	(48,205)
28.	Net Cash Provided/(Used) by Investing Activities	(352,673)
29.	Net Increase/(Decrease) in Cash	(533,074)
30.	Ending Cash	469,932

Revision Date 2010

*Erickson & Brooks*

CERTIFIED PUBLIC ACCOUNTANTS

STEVEN E. PRIBNOW  
DANIEL J. WIESEN  
KENT P. SPEICHER

2196 NORTH BROAD STREET  
P.O. BOX 1270  
FREMONT, NEBRASKA 68026-1270

(402) 721-3454  
FAX (402) 721-2894  
eb-cpa.com

March 3, 2014

To the Board of Directors  
Bush-Tell, Inc.  
Aniak, Alaska

We have audited the financial statements of Bush-Tell, Inc. for the year ended December 31, 2013, and have issued our report thereon dated March 3, 2014. Professional standards require that we provide you with information about our responsibilities under generally accepted auditing standards and *Government Auditing Standards*, as well as certain information related to the planned scope and timing of our audit. We have communicated such information in our letter to you dated September 18, 2013. Professional standards also require that we communicate to you the following information related to our audit.

Significant Auditing Findings

*Qualitative Aspects of Accounting Practices*

Management is responsible for the selection and use of appropriate accounting policies. The significant accounting policies used by Bush-Tell, Inc. are described in Note 1 to the financial statements. No new accounting policies were adopted and the application of existing policies was not changed during the year. We noted no transactions entered into by the Company during the year for which there is a lack of authoritative guidance or consensus. All significant transactions have been recognized in the financial statements in the proper period.

Accounting estimates are an integral part of the financial statements prepared by management and are based on management's knowledge and experience about past and current events and assumptions about future events. Certain accounting estimates are particularly sensitive because of their significance to the financial statements and because of the possibility that future events affecting them may differ significantly from those expected. The most sensitive estimates affecting the financial statements were:

Management's estimate of the cost study true-up is based on revenue requirements relative to all companies participating in the NECA pool. The revenue requirements are determined using complex formulas using the Company's operating cost to provide service and its rate base of assets used in providing that service. The company used the services of a consulting firm to determine that management's estimates were reasonable in relation to the financial statements taken as a whole.

Management's estimate of depreciable lives and estimated residual value of property and equipment is based on historical Regulatory Commission of Alaska guidelines. We evaluated the key factors and assumptions used to develop the depreciable lives and estimated residual value of property and equipment in determining that it is reasonable in relation to the financial statements taken as a whole.

The financial statement disclosures are neutral, consistent, and clear.

*Difficulties Encountered in Performing the Audit*

We encountered no significant difficulties in dealing with management in performing and completing our audit.

## *Ericksen & Brooks*

### *Corrected and Uncorrected Misstatements*

Professional standards require us to accumulate all known and likely misstatements identified during the audit, other than those that are trivial, and communicate them to the appropriate level of management. Management has corrected all such misstatements. However, the attached schedule summarizes uncorrected misstatements of the financial statements. Management has determined that their effects are immaterial, both individually and in the aggregate, to the financial statements taken as a whole.

### *Disagreements with Management*

For purposes of this letter, professional standards define a disagreement with management as a financial accounting, reporting, or auditing matter, whether or not resolved to our satisfaction, that could be significant to the financial statements or the auditor's report. We are pleased to report that no such disagreements arose during the course of our audit.

### *Management Representations*

We have requested certain representations from management that are included in the management representation letter dated March 3, 2014.

### *Management Consultations with Other Independent Accountants*

In some cases, management may decide to consult with other accountants about auditing and accounting matters, similar to obtaining a "second opinion" on certain situations. If a consultation involves application of an accounting principle to the Company's financial statements or a determination of the type of auditor's opinion that may be expressed on those statements, our professional standards require the consulting accountant to check with us to determine that the consultant has all the relevant facts. To our knowledge, there were no such consultations with other accountants.

### *Other Audit Finding or Issues*

We generally discuss a variety of matters, including the application of accounting principles and auditing standards, with management each year prior to retention as the Company's auditors. However, these discussions occurred in the normal course of our professional relationship and our responses were not a condition to our retention.

This information is intended solely for the use of the board of directors and management of Bush-Tell, Inc. and is not intended to be and should not be used by anyone other than these specified parties.

Very truly yours,

ERICKSON & BROOKS

*Ericksen & Brooks*

3/2/2014  
3:00 PM

Client: 6750 - Bush-Tell, Inc.  
Engagement: AUD - Bush-Tell, Inc.(f)  
Period Ending: 12/31/2013  
Trial Balance: TB  
Workpaper: 0500.02 - Passed Journal Entries Report

Account	Description	W/P Ref	Debit	Credit
Passed Journal Entries JE # 36		6000.01		
Reclassify 2014 ATA dues paid in Dec 2013		dw		
1280.40	Prepaid Expenses		5,500.00	
6720.16	Other Expenses-Assoc. Dues			5,500.00
Total			<u>5,500.00</u>	<u>5,500.00</u>

*Erickson & Brooks*  
CERTIFIED PUBLIC ACCOUNTANTS

STEVEN E. PRIBNOW  
DANIEL J. WIESEN  
KENT R. SPEICHER

2196 NORTH BROAD STREET  
P.O. BOX 1270  
FREMONT, NEBRASKA 68028-1270

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eb-cpa.com

Independent Auditor's Report on Compliance with Aspects of Contractual  
Agreements and Regulatory Requirements for Telecommunication Borrowers

Board of Directors  
Bush-Tell, Inc.  
Aniak, Alaska

We have audited, in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States, the financial statements of Bush-Tell, Inc., which comprise the balance sheet as of December 31, 2013, and the related statements of income, changes in stockholders' equity and cash flows for the year ended, and the related notes to the financial statements, and have issued our report thereon dated March 3, 2014. In accordance with *Government Auditing Standards*, we have also issued our report dated March 3, 2014, on our consideration of Bush-Tell, Inc.'s internal control over financial reporting and on our tests of its compliance with certain provisions of laws, regulations, contracts and grant agreements and other matters. No reports other than the reports referred to above and our schedule of findings and recommendations related to our audit have been furnished to management.

In connection with our audit, we noted Bush-Tell, Inc. failed to meet the TIER ratio requirement, resulting in Bush-Tell, Inc. failing to comply with the covenants of the loan documents. No other items came to our attention that caused us to believe that terms, covenants, provisions, or conditions of their loan, grant, and security instruments as set forth in 7 CFR Part 1773, *Policy on Audits of Rural Utilities Service Borrowers*, Section 1773.33 and clarified in the RUS policy memorandum dated February 7, 2014, insofar as they relate to accounting matters as enumerated below. However, our audit was not directed primarily toward obtaining knowledge of noncompliance. Accordingly, had we performed additional procedures, other matters may have come to our attention regarding Bush-Tell, Inc.'s noncompliance with the above-referenced terms, covenants, provisions, or conditions of the contractual agreements and regulatory requirements, insofar as they relate to accounting matters. In connection with our audit, we noted no matters regarding Bush-Tell, Inc.'s accounting and records to indicate that Bush-Tell, Inc. did not:

- Maintain adequate and effective accounting procedures;
- Utilize adequate and fair methods for accumulating and recording labor, material, and overhead costs, and the distribution of these costs to construction, retirement, and maintenance or other expense accounts;
- Reconcile continuing property records to the controlling general ledger plant accounts;
- Clear construction accounts and accrue depreciation on completed construction;
- Record and properly price the retirement of plant;
- Seek approval of the sale, lease or transfer of capital assets and disposition of proceeds for the sale or lease of plant, material, or scrap;
- Maintain adequate control over materials and supplies;
- Prepare accurate and timely Financial and Operating Reports;

*Erickson & Brooks*

- Obtain written RUS approval to enter into any contract for the management, operation, or maintenance of the borrower's system if the contract covers all or substantially all of the telecommunication system;
- Disclose material related party transactions in the financial statements, in accordance with requirements for related parties in generally accepted accounting principles;
- Record depreciation in accordance with RUS requirements (See RUS Bulletin 183-1, Depreciation Rates and Procedures);
- Comply with the requirements for the detailed schedule of deferred debits and deferred credits; and
- Comply with the requirements for the detailed schedule of investments.

This report is intended solely for the information and use of the board of directors, management, and the RUS and supplemental lenders and is not intended to be and should not be used by anyone other than these specified parties. However, this report is a matter of public record and its distribution is not limited.

ERICKSON & BROOKS

*Erickson & Brooks*

Fremont, Nebraska  
March 3, 2014



[REDACTED]

In evaluating any decisions to deploy broadband to its remaining communities Bush-Tell is following the guidance defined by the FCC per the 3<sup>RD</sup> Order on Reconsideration at Paragraph 46:

46. We appreciate the concerns raised by the Alaska Rural Coalition and ACS that it may not be cost-effective to serve certain customers due to the high cost of backhaul. Rather than granting a blanket exemption of the broadband obligations established for rate-of-return companies in the *USF/ICC Transformation Order*, we clarify, as the Alaska Rural Coalition requests, that our current rules provide sufficient flexibility to take into account any unique circumstances that may impact the ability of rate-of-return companies to extend broadband to their customers, including backhaul costs. As the Coalition notes, rate-of-return carriers are required to provide service meeting the specified characteristics on *reasonable* request, which, the Commission explained in the *Order*, was an obligation similar to the voice deployment obligation many of those carriers were already subject to. This obligation, enforced in the first instance by the relevant ETC-designating authority (generally the state), permits these entities to take into account backhaul costs or other unique circumstances that may make it cost-prohibitive to extend service to particular customers, in Alaska or any other area. We intend to carefully monitor developments in this regard and will consider making further clarifications or revisions if necessary.

[REDACTED]

Bush Tell 5 year build out plan narrative

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

NETWORK IMPROVEMENT PROJECTS

MAP REF.	NINE CENTER NAME	DESCRIPTION of IMPROVEMENT Self Fund	COST ESTIMATE		Estimated Project build Year					Service Impaired	AMOUNT IN US\$ SUPPORT AREA PAGE	% VOICE	% BROADBAND	AREA IMPACTED	POPULATION IMPACTED	TARGET COMPLETION DATE	ACTUAL COMPLETION DATE	Notes
			2015	2016	2017	2018	2019	2020	***							***		
	Anvik	[Bar chart]	244,850	107,950	118,550	108,700	125,000	109,650							572	***	***	
	Belknap	[Bar chart]																
	HON Cross	[Bar chart]																
	Shageluk	[Bar chart]																
	Grayling	[Bar chart]																
	Anvik	[Bar chart]																
	Crooked Creek	[Bar chart]																
	Red Devil	[Bar chart]																
	Sleetmute	[Bar chart]																
	Stoney River	[Bar chart]																
		TOTAL PROJECTS																

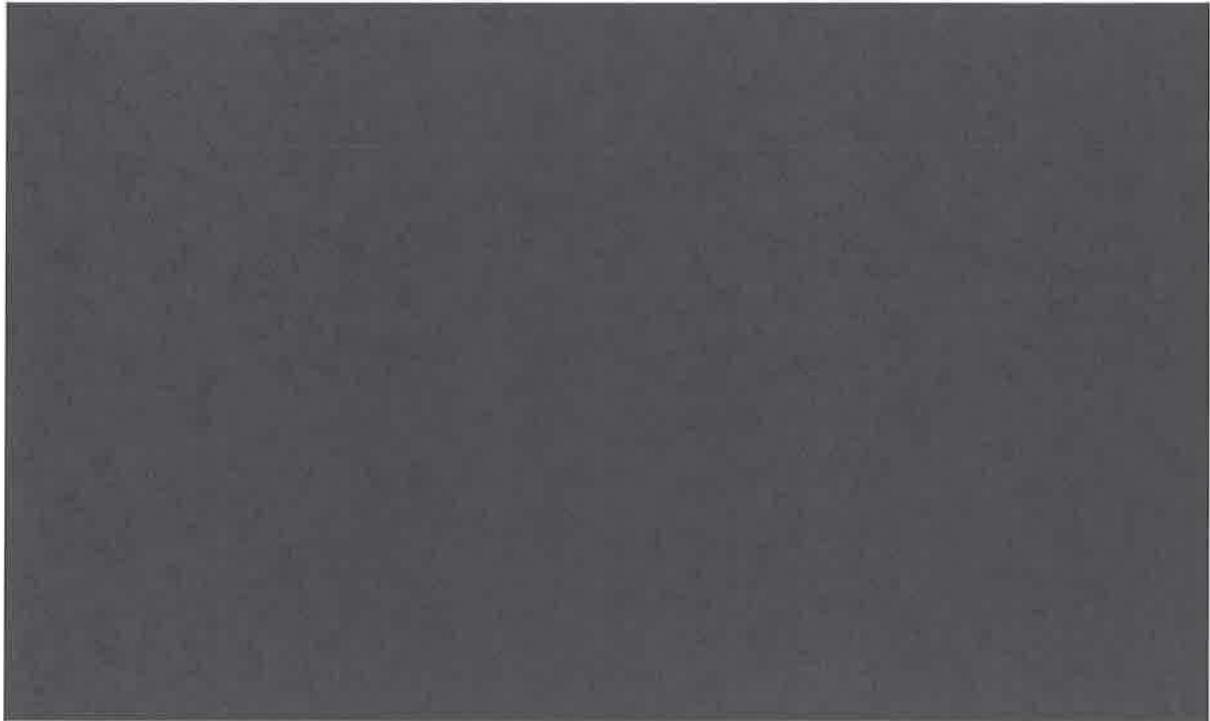
REDACTED - FOR PUBLIC INSPECTION

**NETWORK IMPROVEMENT PROJECTS**

MAP REF.	WIRE CENTER NAME	DESCRIPTION of IMPROVEMENT	COST ESTIMATE	Estimated Project build Year					2020
				2015	2016	2017	2018	2019	
	A	<b>Loan/Grant</b>							0
	Microwave System	Secure land, Permits and Environmental impact studies							
	Aniak	[REDACTED]	[REDACTED]			[REDACTED]			
	Gibraltar Point	[REDACTED]	[REDACTED]			[REDACTED]			
	Oguahayook Ridge	[REDACTED]	[REDACTED]			[REDACTED]			
	Crooked Creek	[REDACTED]	[REDACTED]			[REDACTED]			
	George Town	[REDACTED]	[REDACTED]				[REDACTED]		
	Red Devil	[REDACTED]	[REDACTED]				[REDACTED]		

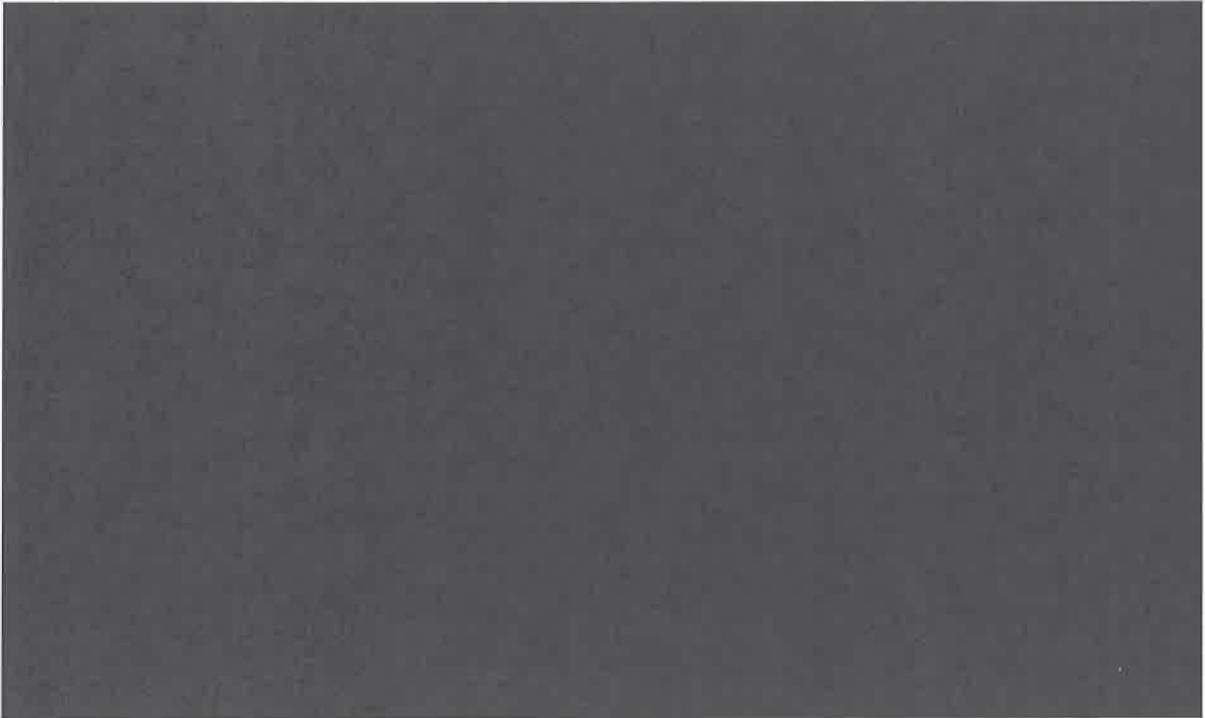


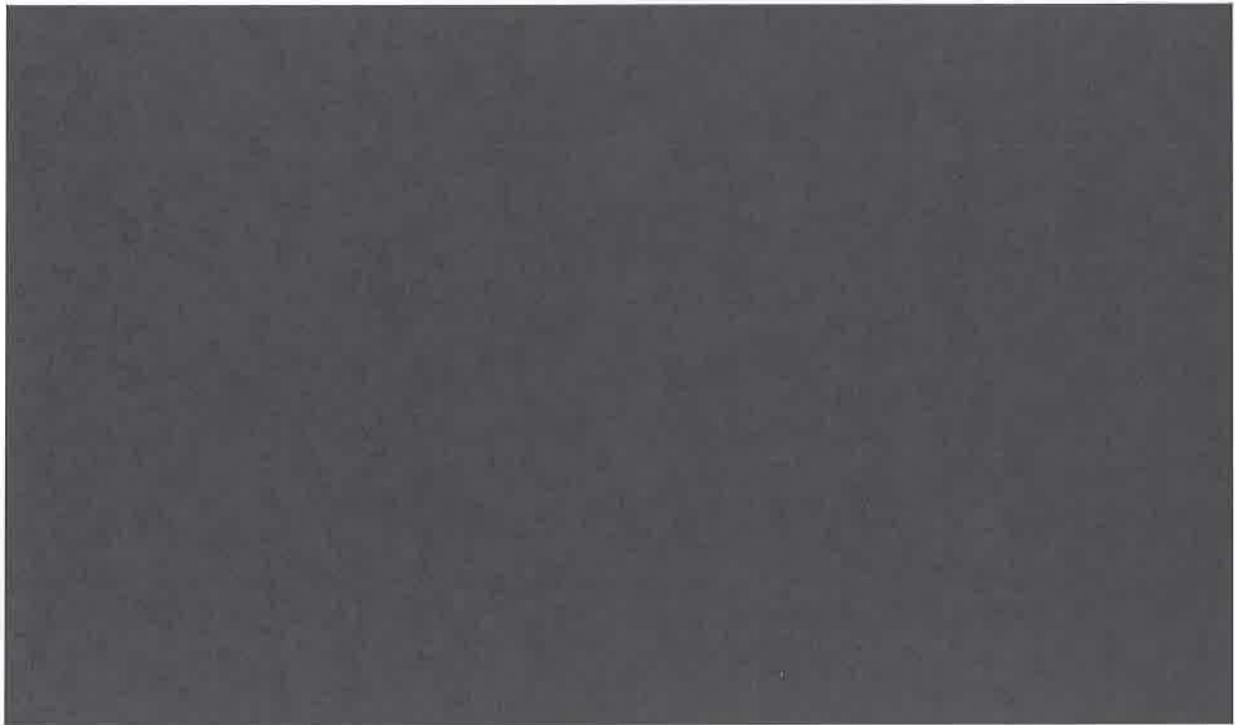
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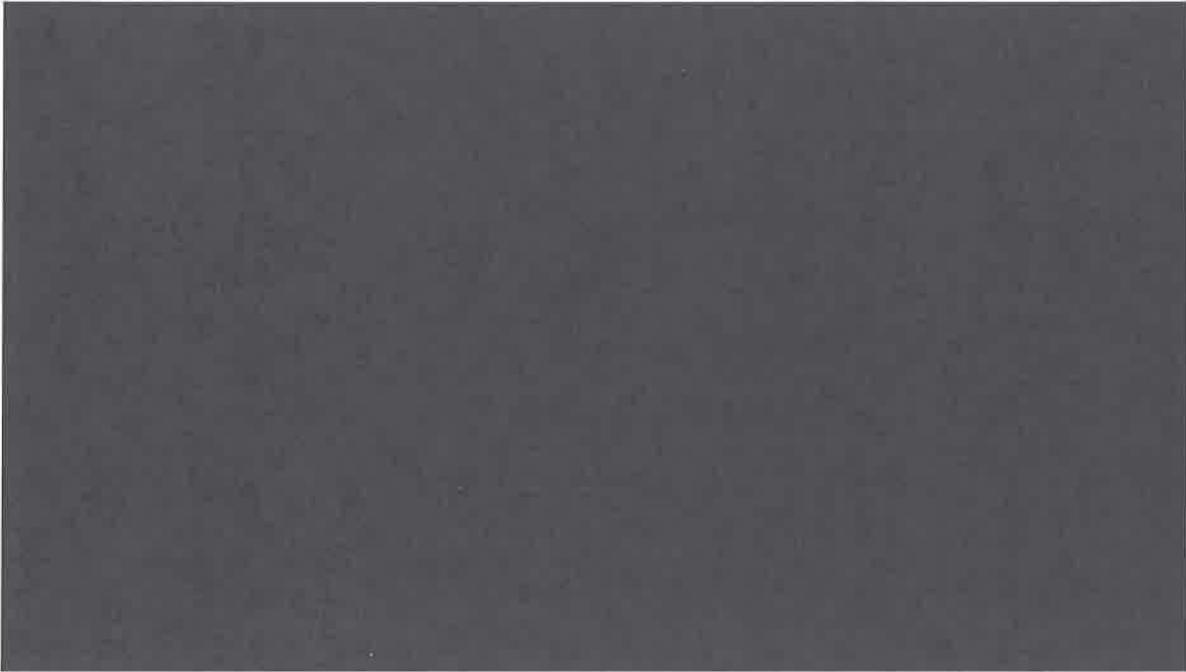




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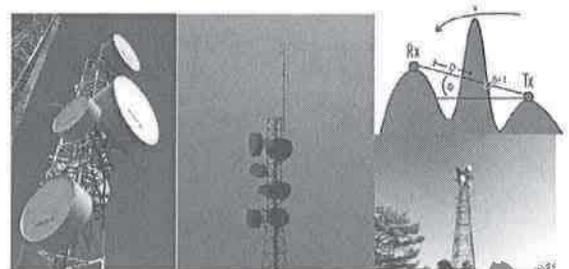
# MICROWAVE RADIO SYSTEM FEASIBILITY STUDY

January 2013

For



Prepared by



MICROWAVE FEASIBILITY STUDY BUSH TEL

NARRATIVE

[REDACTED]



PATH DESIGN

[REDACTED]

[REDACTED]

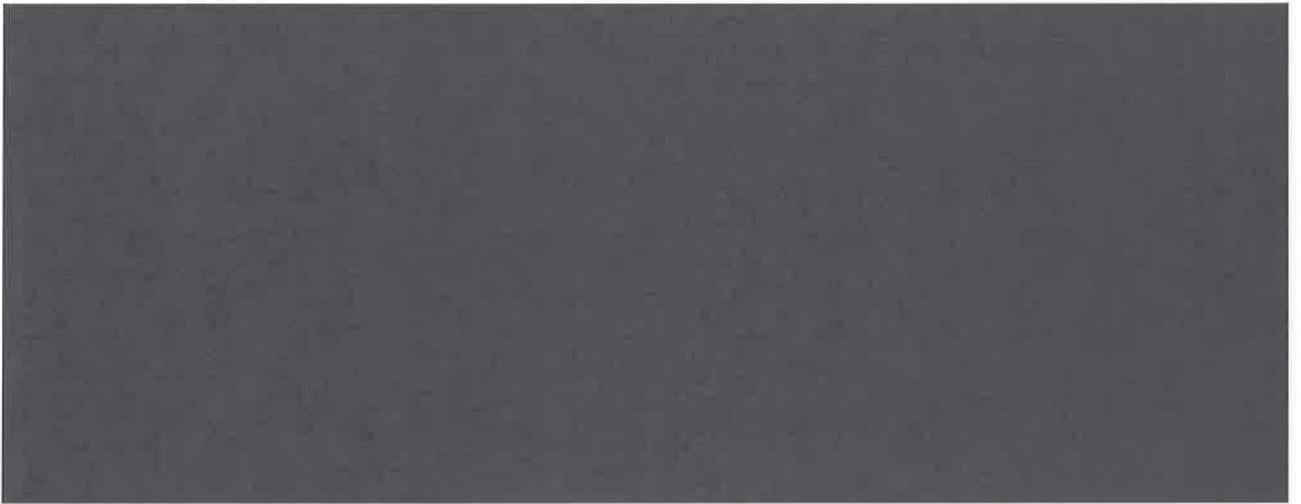
[REDACTED]

[REDACTED]

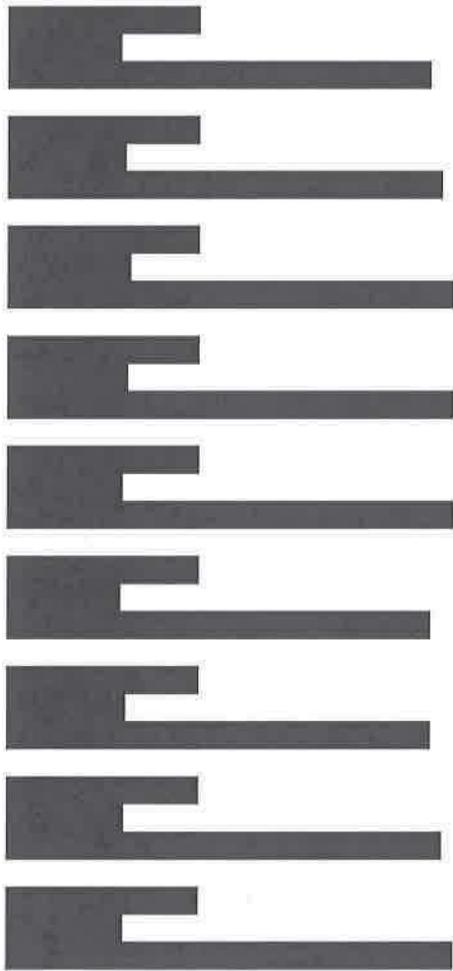
[REDACTED]

[REDACTED]

PROPOSED ROUTE



PROPOSED TOWER LOCATIONS



PATH INFORMATION

[REDACTED]

LAND STATUS MAP



REDACTED - FOR PUBLIC INSPECTION



RECOMMENDATIONS

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]