



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

July 1, 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 Hopi Telecommunications, Inc.
Study Area Code 450815**

Dear Ms. Dortch:

On behalf of Hopi Telecommunications, Inc. (“Hopi”), 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 Hopi 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 Plan³ and certain financial and subscriber data.

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
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445 12th Street, SW
Washington, DC 20554

**Re: WC Docket No. 10-90, WC Docket No. 11-42
2014 ETC Annual Report of Hopi Telecommunications, Inc.
Study Area Code 450815
Request for Confidentiality**

Dear Ms. Dortch:

John Staurulakis, Inc. (“JSI”), on behalf of its client Hopi Telecommunications, 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. The Company also seeks the withholding from public inspection certain financial and subscriber information required at Line 900, Tribal Lands Reporting, as contained in the Annual Report to the Hopi Tribe. Information of

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).

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	450815
<015> Study Area Name	HOPI TELECOMMUNICATIONS COMPANY
<020> Program Year	2015
<030> Contact Name: Person USAC should contact with questions about this data	Carroll Onsaе
<035> Contact Telephone Number: Number of the person identified in data line <030>	9285228428 ext.
<039> Contact Email Address: Email of the person identified in data line <030>	consae@hopitelecom.com

ANNUAL REPORTING FOR ALL CARRIERS	54.313 Completion Required	54.422 Completion Required
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(check box when complete)

<100> Service Quality Improvement Reporting	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>
<300> Unfulfilled Service Requests (voice)	1 450815az310.pdf	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<310> Detail on Attempts (voice)	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<320> Unfulfilled Service Requests (broadband)	0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<330> Detail on Attempts (broadband)	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<400> Number of Complaints per 1,000 customers (voice)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<410> Fixed	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420> Mobile	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<430> Number of Complaints per 1,000 customers (broadband)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<440> Fixed	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<450> Mobile	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<500> Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510> 450815az510.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> 450815az610.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 checked="" type="checkbox"/>
<710> Company Price Offerings (broadband)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" 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 checked="" type="radio"/> <input type="radio"/>	(if yes, complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1000> Voice Services Rate Comparability	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1010> (attach descriptive document)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1100> Terrestrial Backhaul (Y/N)? <input checked="" type="radio"/> <input type="radio"/>	(if not, check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1110>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1200> Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input checked="" 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 checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<2005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet

<3000>	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<3005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" 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 450815

<015> Study Area Name HOPI TELECOMMUNICATIONS COMPANY

<020> Program Year 2015

<030> Contact Name - Person USAC should contact regarding this data Carrolll Onsaee

<035> Contact Telephone Number - Number of person identified in data line <030> 9285228428 ext.

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

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

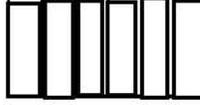
<111> If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC? (yes / no)

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

450815az112.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.

**(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	450815
<015>	Study Area Name	HOPi TELECOMMUNICATIONS COMPANY
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Carroll Onsaie
<035>	Contact Telephone Number - Number of person identified in data line <030>	9285228428 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	consae@hopitelecom.com

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

Hopi Tribe

<920> Tribal Government Engagement Obligation

450815az920.pdf

Select (Yes, No, NA)
Yes
Yes

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

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

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

<010>	Study Area Code	450815
<015>	Study Area Name	HOPi TELECOMMUNICATIONS COMPANY
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Carroll Onsay
<035>	Contact Telephone Number - Number of person identified in data line <030>	9285228428 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	consae@hopitelecom.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	450815
<015>	Study Area Name	HOPI TELECOMMUNICATIONS COMPANY
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Carroll Onsaie
<035>	Contact Telephone Number - Number of person identified in data line <030>	928528428 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	consae@hopitelecom.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

<1220> Link to Public Website

HTTP <http://www.hopitelecom.com/services-lifeline.php>

<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	450815
<015>	Study Area Name	HOP1 TELECOMMUNICATIONS COMPANY
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Carroll Onaee
<035>	Contact Telephone Number - Number of person identified in data line <030>	9285228428 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	conaee@hop1telecom.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"/>

[Redacted Box]

Name of Attached Document Listing Required Information

REDACTED FOR PUBLIC INSPECTION

(3000) Rate Of Return Carrier Additional Documentation
Data Collection Form
FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010> Study Area Code 450815
 <015> Study Area Name HOPI TELECOMMUNICATIONS COMPANY
 <020> Program Year 2015
 <030> Contact Name - Person USAC should contact regarding this data Carroll Onisae
 <035> Contact Telephone Number - Number of person identified in data line <030> 9285228428 ext.
 <039> Contact Email Address - Email Address of person identified in data line <030> conisae@hopitelecom.com

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

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

(3011) Name of Attached Document Listing Required Information

(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

(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)
 (3016)

(3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation
 Name of Attached Document Listing Required Information (Yes/No) (Yes/No)
 450815az3017.pdf

(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)

(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)

(3026) Attach the worksheet listing required information
 Name of Attached Document Listing Required Information

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	450815
<015>	Study Area Name	HOPI TELECOMMUNICATIONS COMPANY
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Carroll Onsaе
<035>	Contact Telephone Number - Number of person identified in data line <030>	9285228428 ext .
<039>	Contact Email Address - Email Address of person identified in data line <030>	consae@hopitelecom.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	450815
<015>	Study Area Name	HOPI TELECOMMUNICATIONS COMPANY
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Carroll Onsaе
<035>	Contact Telephone Number - Number of person identified in data line <030>	9285228428 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	consae@hopitelecom.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>HOPI TELECOMMUNICATIONS COMPANY</u>	
Signature of Authorized Officer: <u>CERTIFIED ONLINE</u>	Date: <u>06/25/2014</u>
Printed name of Authorized Officer: <u>Carroll Onsaе</u>	
Title or position of Authorized Officer: <u>President/General Manager</u>	
Telephone number of Authorized Officer: <u>9285228428 ext.</u>	
Study Area Code of Reporting Carrier: <u>450815</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>HOPI TELECOMMUNICATIONS COMPANY</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>06/25/2014</u>
Printed name of Authorized Agent or Employee of Agent: <u>Cassandra Heyne</u>	
Title or position of Authorized Agent or Employee of Agent: <u>consultant</u>	
Telephone number of Authorized Agent or Employee of Agent: <u>3014597590 ext.</u>	
Study Area Code of Reporting Carrier: <u>450815</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

HOPI TELECOMMUNICATIONS COMPANY (SAC 450815)

ATTACHMENT - LINE 112

FIVE YEAR SERVICE QUALITY IMPROVEMENT PLAN

ATTACHMENT REDACTED IN ENTIRETY

Voice Telephone Service Request - PENDING FOR SLA, Engineering or Land dispute

DATE	PHYSICAL ADDRESS AND REASON UNFULFILLED	TEL	LIFELINE
1/7/2013	Second Mesa BIA Rt 17 Needs SLA/Engineering	X	X

Certification for Hopi Telecommunications, Inc.

Demonstration of Compliance with Applicable Service Quality Standards and Consumer Protection Rules

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

Hopi Telecommunications, Inc. (“HTI” or the “Company”) hereby certifies that it is complying with applicable service quality standards and consumer protection rules. As a company owned by the Hopi Tribe, HTI operates under terms and conditions that afford its customers, most of whom are members of the Tribe, with the consumer protections and service quality standards that will be in their best interest. HTI has developed a Local Exchange Tariff modeled after the tariff of CenturyTel from whom it purchased the three local exchanges for which it was designated an ETC. The rules and

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.

regulations in this tariff are based upon Arizona Corporation Commission (“ACC”) rules. Although HTI is not under the jurisdiction of the ACC, the consumer protection standards in the HTI tariff are the same as those required by the ACC for telecommunications carriers that are under state jurisdiction. These initial provisions may be modified from time to time with the approval of, or at the request of the Hopi Tribal Council. Other obligations include, but are not limited to, truth-in-billing requirements and CPNI, Red Flag Rules and other applicable federal requirements governing the protection of customers’ privacy.

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

Certification for Hopi Telecommunications, Inc.

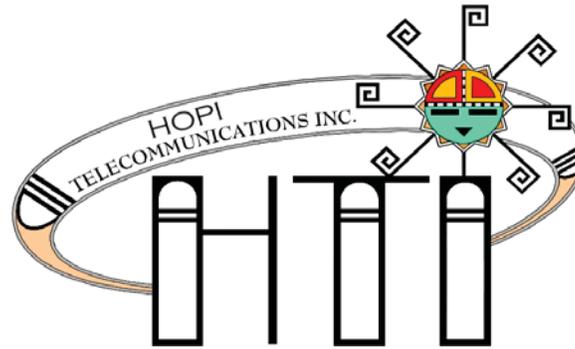
Demonstration of Ability to Function in Emergency Situations

Hopi Telecommunications, Inc. (“Company”) hereby certifies that it is able to function in emergency situations as set forth in §54.201(a)(2).¹ The Company’s voice and broadband network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow the Company to manage traffic spikes throughout its network, as emergency situations require.

Specifically, each central office building is 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. The Company 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 the Company has access to propane.

¹ Section 54.201(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.”

Hopi Telecommunications, Inc.
Annual Report
For the year ending 2013



*Owned by the Hopi Tribe,
your Telephone Company*

Objectives of this report

1. Report to Council on HTI's corporate affairs and business during the previous calendar year.
2. Provide a projection of the business activities HTI expects to undertake in the current calendar year (2014).
3. Report and submit an audited financial statement for fiscal year 2013.

HOPI TELECOMMUNICATIONS, INC.

AGENDA

- HTI History & Purposes
- 2013 Activities
- 2014 Scheduled Activities
- 2013 Audited Financial Statement
- 2014 Budget

HOPI TELECOMMUNICATIONS, INC.

HTI History

- Hopi Tribal Council by Resolution H-043-2004 approved the business plan and established HTI
- Hopi Tribal Council reaffirmed the purpose of HTI by Resolution H-004-2010
- HTI Board of Directors consist of the following:
 - Board Chairman – James Underwood
 - Board Vice Chairman – Donald Massey
 - Board Secretary - Wilfred Moore
 - Board Member - Mickey McKandles
 - Board Member – Wilbur Maho
- Hopi Tribal Council provided an equity contribution of _____ to HTI

HOPI TELECOMMUNICATIONS, INC.

HTI Purposes

- To construct, operate, and maintain telecommunications as a secure and profitable business of the Hopi Tribe.
- To develop, improve, and manage the telecommunications infrastructure on the Hopi Reservation and the lands of the Hopi Tribe.
- To improve, promote, and develop businesses and economic opportunities for the Hopi Tribe and its members on or near the Hopi Reservation and the lands of the Hopi Tribe.
- To provide employment opportunities for the Hopi Tribe and its members on or near the Hopi Reservation and the lands of the Hopi Tribe.
 - HTI has 14 employees and 9 are Hopi Tribal members.

HOPI TELECOMMUNICATIONS, INC.

2013 Activities

- Hopi Tribal Council Resolution H-060-2013 delegates to the Hopi Telecommunications, Inc. the authority to control, manage, and operate the Tower Facilities on behalf of the Hopi Tribe.
- Implementation of the Mapping technology to enhance HTI's capability to map its existing and future fiber optic and copper cable network.

HOPI TELECOMMUNICATIONS, INC.

2013 Activities (Con't)

- Continued to develop HTI Operations:
 - HTI added DSL customers during 2013, and currently has DSL customers.
 - HTI added Lifeline customers during 2013 and currently has Lifeline customers.

HOPI TELECOMMUNICATIONS, INC.

2013 Activities (Con't)

- Continue to provide satellite voice and data service for HTI subscribers residing in areas currently lacking a telecommunications infrastructure.
- Completed 100% cut-over of HTI subscribers from DMS-10 legacy switch to state of the art softswitch.

HOPI TELECOMMUNICATIONS, INC.

2014 Scheduled Activities

- Continue extending DSL, telephone and broadband services to new customers.
- Add 45 Mbps to our DSL Bandwidth for a total of 90 Mbps capacity.
- Maintain and upgrade our copper/fiber outside plant network.

HOPI TELECOMMUNICATIONS, INC.

2014 Scheduled Activities

- Mapping project to collect and digitize HTI's telecommunications infrastructure data.
- Extend fiber to the Tribal Headquarters and the Hopi Ranger Station in Kykotsmovi. This project will be successful when HTI obtains ROWs.
- Continue to monitor and report to the FCC on the Broad Band Pilot Project for the FCC's Broadband Lifeline Program.

HOPI TELECOMMUNICATIONS, INC.

2014 Scheduled Activities

- BLC equipment for Ranger Station and residential.
- Fiber optic cable to the Hopi Towers.
- American Recovery and Reinvestment Act grant/loan award in the amount of \$3.6 mil.

HOPI TELECOMMUNICATIONS, INC.

ARRA Purposes

- To build out infrastructure and acquire necessary equipment to establish the first fiber-optic telecommunications connection between HTI and the world.
- To provide basic telephone and broadband services to currently unserved subscribers around the communities of Spider Mound and Jeddito.

HOPI TELECOMMUNICATIONS, INC.

ARRA Goals

- Build 61 miles of fiber-optics cable between the community of Jeddito and Holbrook.
- Create reliable and high speed broadband connectivity to all HTI's subscribers.

HOPI TELECOMMUNICATIONS, INC.

ARRA Goals (Con't)

- Provide voice and data services to subscribers at Jeddito and Spider Mound utilizing wireless point-to-multipoint WiMAX access equipment.
- Implement an Ethernet Network to provide services to anchor institutions, i.e., tribal government, schools, health care, etc.

HOPI TELECOMMUNICATIONS, INC.

ARRA Goals (Con't)

- Effectively replace the current microwave telecommunications transport system as the primary connection to the world.

HOPI TELECOMMUNICATIONS, INC.

HTI 2014 Capital Expenditure Budget

- Central Office & Electronic Equipment @ [REDACTED]
- Outside Plant Construction @ [REDACTED]
- Vehicles & Work Equipment @ [REDACTED]
- Other related (environmental assessments, engineering and support costs) @ [REDACTED]
- Complete the ARRA project ([REDACTED])

HOPI TELECOMMUNICATIONS, INC.

The 2013 audited financial statements for HTI and LSC

A consolidated financial audit for FY 2013 is complete, performed by an independent audit firm Bolinger, Segars, Gilbert & Moss, L.L.P., Certified Public Accountants, for Hopi Telecommunications, Incorporated and Subsidiary (Little Star Communications, Inc.)

HOPI TELECOMMUNICATIONS, INC.

Regulatory Authorities

HTI is regulated by:

- Federal Communications Commission (FCC)
- National Exchange Carrier Association (NECA)
- Universal Service Administrative Company (USAC)
- Rural Development Utility Program (RDUP) – (Contractual loan agreement)

HOPI TELECOMMUNICATIONS, INC.

Regulatory Activities

- FCC Rate Floor Schedule for voice service

Current		Proposed	
<u>FCC</u>	<u>HTI</u>	<u>FCC</u>	<u>HTI</u>
\$14.00	\$14.50	\$20.46	\$21.00

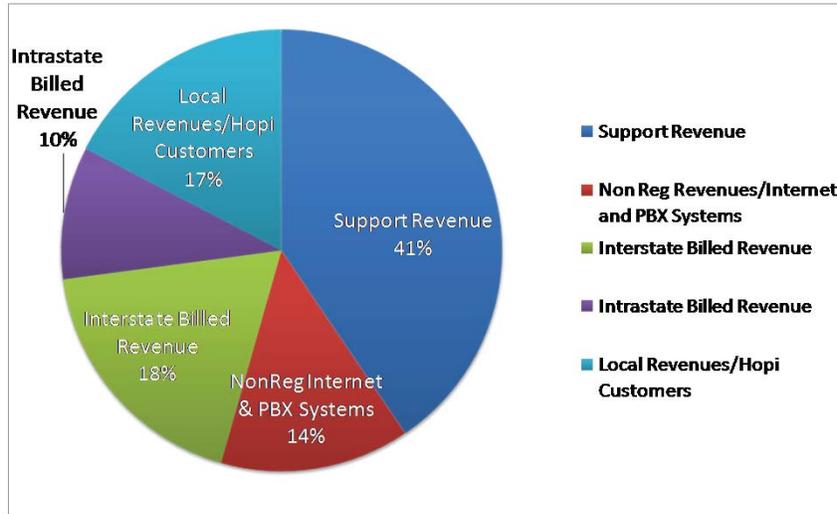
HOPI TELECOMMUNICATIONS, INC.

Enhanced Lifeline Benefits

- Is a Federal Government program to assist residents on Tribal lands.
- Requires annual qualification after the first 12 months.
- Provides for local calls and emergency services
- No long distance is provided.
- HTI has promoted and encouraged enrollment.
- HTI currently has [REDACTED] Lifeline customers.

HOPI TELECOMMUNICATIONS, INC.

Hopi Telecommunications, Inc. Sources of Revenue



HTI 2014 Operations Budget

Category	Item	Amount	Total
Operating Expenses	Salaries		
	Benefits		
	Travel		
	Telephone		
	Utilities		
	Depreciation		
	Insurance		
	Professional Fees		
	Advertising		
	Other		
Total Operating Expenses			
Total Budget			

HTI Community Involvement

- HTI contributed over \$8,900 to various organizations for the benefit of Hopi Tribal members, **Organizations and Entities include:**

Hopi Education Endowment	Hopi Day School
Hopi Domestic Violence Program	Hopi Tribal Housing Authority
Office of Special Needs	Hopi Cancer Support Services
Hopi Vice Chairman's Office	Hopi Head Start Disabilities Support Group
Hopi -Tewa Women's Coalition to End Abuse	Office of Hopi Veterans Services
Native Americans for Community Action, Inc.	
Dean James Memorial Committee	
Keams Canyon Elementary School PTO	
Hopi Healthy Homes Collaborative	
Flagstaff Unified School District Indian Education Program	
Hopi Youth Soccer	
Hopi Devil Cats	
Miss Hopi Committee	
Shungopavi Clan Run	
Hopi Tribe Economic Development Corporation	
Hopi Harvest Festival	

HOPI TELECOMMUNICATIONS, INC.

THANK YOU

For more information on HTI's service offerings you may call

Keams Canyon Office: (928) 738-HOPI (4674)

Flagstaff Office: (928) 522-8428

HOPI TELECOMMUNICATIONS, INC.

REDACTED – FOR PUBLIC INSPECTION

HOPI TELECOMMUNICATIONS COMPANY (SAC 450815)

ATTACHMENT - LINE 3017

ATTACHMENT REDACTED IN ENTIRETY