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P.O. Box 707
Ulysses, Kansas 67880-0707

Tel: 620 / 356-3211
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Internet: www.pioncomm.net

DOCKET FILE COPY ORIGINAL

Received & Inspected

JUL 01 2014

FCC Mail Room

VIA ECFS

June 27, 2014

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of Secretary
445 12th Street, S. W.
Washington, D.C. 20554

RE: Submission of information Pursuant to FCC 54.313 Rules and Request for Confidential Treatment – Connect America Fund, WC Docket No. 10-90; Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42

Dear Ms. Dortch:

In accordance with the annual reporting requirements of 47 C.F.R. §§54.313 and 54.422, The Pioneer Telephone Association, Inc. d/b/a Pioneer Communications ("Pioneer"), Kansas, Study Area Code 411817, is submitting a completed FCC Form 481 to the Commission via its Electronic Comment Filing System (ECFS) in WC Docket Nos. 10-90 and 11-42. Pioneer, hereby requests confidential treatment of two attachments to its FCC Form 481: (1) the five-year service quality improvement plan identified on Form 100, Line 112 and (2) the financial annual report identified on Form 3005, both of which were redacted in the ECFS submission. The request for confidential treatment of the five-year plan is being made pursuant to section 0.459 of the Commission's rules and Exemption 4 of the Freedom of Information Act (FOIA). The request for confidential treatment of the financial annual report is being made pursuant to the FCC's November 16, 2012 Protective Order in WC Docket No. 10-90 et al. These attachments contain competitively sensitive data that Pioneer maintains as confidential and does not normally make available to the public. Release of this information would have a substantial negative impact on the Company.

Pioneer is also transmitting the following information to the Commission in compliance with C.F.R. §§54.313 and 54.422:

- Submission to the Office of the Secretary, this cover letter and the Form 481 filing which includes the confidential information that is being requested to be withheld from public inspection. Confidential information has been designated in accordance with Confidentiality guidelines and the Protective Order.
- Two copies of the Form 481 filing in redacted form and an accompanying cover letter are also being provided with the confidential filing.

No. of Copies rec'd 041
List ABCDE

- Two copies of this cover letter and the Form 481 filing with the confidential information are also being delivered to Mr. Charles Tyler, Telecommunications Access Policy Division, Wireline Competition Bureau.

The confidential information has also been submitted to the Universal Service Administrative Company through its E-File system as an attachment to the FCC Form 481. Pioneer requests that the information contained in its five-year service quality improvement plan be withheld from public inspection because it contains competitively sensitive commercial and financial information that the Company keeps confidential. Public availability of this information would have a substantial negative impact on the Company. Pioneer offers the following information pursuant to section 0.459 of the Commission's rules and Exemption 4 of FOIA in support of this request:

(1) Identification of the specific information for which confidential treatment is sought:

Attachment to Line 112 of FCC Form 481 – Five-Year Service Quality Improvement Plan. Specifically, confidential treatment is sought for all information in the five-year plan related to the Company's future network plans and information concerning future services provided to customers.

(2) Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission:

The information was submitted in WC Docket Nos. 10-90 and 11-42 as an attachment to FCC Form 481- the Carrier Annual Reporting Data Collection Form. Section 100 of FCC Form 481 requires incumbent local exchange carriers receiving high cost support to attach a five-year service quality improvement plan, pursuant to 47 C.F.R. §§54.202(a)(1)(ii) and 54.313(a)(1).

(3) Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged:

The five-year service quality improvement plan contains information on the Company's future plans, number of customers served and other planning information that company does not make publicly available.

(4) Explanation of the degree to which the information concerns a service that is subject to competition:

Broadband is subject to increasing competition in the areas served by rural, rate-of-return incumbent local exchange carriers (RLECs). Virtually all RLECs face competition from one or more Internet service providers.

(5) Explanation of how disclosure of the information could result in substantial competitive harm:

Disclosure of the information contained in the five-year plan would provide competitors with detailed, granular information regarding the Company's strategic plans. This would provide competitors access to confidential information they could employ to develop their own plans a particular service area. This could cause competitive harm to the Company.

(6) *Identification of any measures taken by the submitting party to prevent unauthorized disclosure:*

The Company has continually treated information regarding its network and service plans as confidential and carefully controls the information to protect it from competitors.

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

The redacted information in the five-year plan is not available to the public, and third party access is limited as described in (6) above.

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

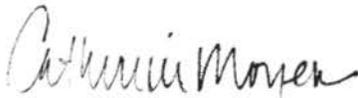
The Company requests that the extracted information be withheld from public inspection indefinitely. The five year planning period information would provide valuable information to competitors for several years beyond that period.

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

Exemption 4 of FOIA shields from public disclosure commercial or financial information obtained from a person that is privileged or confidential. Based on the responses provided above, the information in question satisfies this test.

Please contact me if you have any questions.

Regards,



Catherine Moyer
General Manager & CEO
Pioneer Communications
(620) 356-7133 direct phone
(620) 424-3133 direct fax
catherine.moyer@pioncomm.net

Enclosures

cc: Mr. Charles Tyler, Telecommunications Access Policy Division, Wireline Competition Bureau, Federal Communications Commission, (2 hardcopies of confidential submission)



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(2) Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission:

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Please contact me if you have any questions.

Regards,



Catherine Moyer
General Manager & CEO
Pioneer Communications
(620) 356-7133 direct phone
(620) 424-3133 direct fax
catherine.moyer@pioncomm.net

Enclosures

cc: Mr. Charles Tyler, Telecommunications Access Policy Division, Wireline Competition Bureau, Federal Communications Commission, (2 hardcopies of confidential submission)

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

Received & Inspected

JUL 07 2014

FCC Mail Room

<010>	Study Area Code	411817
<015>	Study Area Name	PIONEER TEL ASSN INC
<020>	Program Year	2015
<030>	Contact Name: Person USAC should contact with questions about this data	Catherine Moyer
<035>	Contact Telephone Number: Number of the person identified in data line <030>	6203563211 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	catherine.moyer@pioncomm.net

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 type="checkbox"/>
<200>	Outage Reporting (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210>	<input type="text" value="0"/> <- check box if no outages to report		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<300>	Unfulfilled Service Requests (voice)	<input type="text" value="0"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<310>	Detail on Attempts (voice)	(attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>
<320>	Unfulfilled Service Requests (broadband)	<input type="text" value="0"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<330>	Detail on Attempts (broadband)	(attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>
<400>	Number of Complaints per 1,000 customers (voice)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<410>	Fixed	<input type="text" value="0.0"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420>	Mobile	<input type="text" value=""/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<430>	Number of Complaints per 1,000 customers (broadband)		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<440>	Fixed	<input type="text" value="0.0"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<450>	Mobile	<input type="text" value="0.0"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<500>	Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510>	<input type="text" value="411817ks510.pdf"/>	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600>	Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610>	<input type="text" value="411817ks610.pdf"/>	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700>	Company Price Offerings (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<710>	Company Price Offerings (broadband)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<800>	Operating Companies and Affiliates	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900>	Tribal Land Offerings (Y/N)? <input type="radio"/> <input checked="" type="radio"/>	(if yes, complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1000>	Voice Services Rate Comparability	(check to indicate certification)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1010>	<input type="text" value="411817ks1000.pdf"/>	(attach descriptive document)	<input checked="" type="checkbox"/>	<input 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 type="checkbox"/>
<1110>		(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1200>	Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet				
Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers				
<2000>		(check to indicate certification)	<input type="checkbox"/>	<input type="checkbox"/>
<2005>		(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>
Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet				
<3000>		(check to indicate certification)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<3005>		(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>

(100) Service Quality Improvement Reporting Data Collection Form	FCC Form 481
	OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013

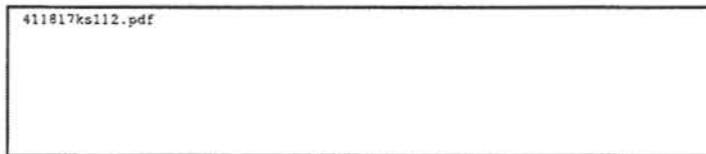
<010> Study Area Code	411817
<015> Study Area Name	PIONEER TEL ASSN INC
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Catherine Moyer
<035> Contact Telephone Number - Number of person identified in data line <030>	6203563211 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	catherine.moyer@pioncomm.net

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

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

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

<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
- <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	411817
<015> Study Area Name	PIONEER TEL ASSN INC
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Catherine Moyer
<035> Contact Telephone Number - Number of person identified in data line <030>	6203563211 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	catherine.moyer@pioncomm.net

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

<920> Tribal Government Engagement Obligation

Name of Attached Document

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

- <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)

(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	411817
<015>	Study Area Name	PIONEER TEL ASSN INC
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Catherine Moyer
<035>	Contact Telephone Number - Number of person identified in data line <030>	6203563211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	catherine.moyer@pioncomm.net

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

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

(1200) Terms and Condition for Lifeline Customers Lifeline Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	411817
<015> Study Area Name	PIONEER TEL ASSN INC
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Catherine Moyer
<035> Contact Telephone Number - Number of person identified in data line <030>	6203563211 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	catherine.moyer@pioncomm.net

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

411817ksl200.pdf

Name of Attached Document

<1220> Link to Public Website

HTTP <http://www.pioncomm.net/lifeline/index.htm>

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,
- <1222> Details on the number of minutes provided as part of the plan,
- <1223> Additional charges for toll calls, and rates for each such plan.

(2000) Price Cap Carrier Additional Documentation Data Collection Form <i>Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers</i>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	411817
<015>	Study Area Name	PIONEER TEL ASSN INC
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Catherine Moyer
<035>	Contact Telephone Number - Number of person identified in data line <030>	6203563211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	catherine.moyer@pioncomm.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
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<010> Study Area Code	411817
<015> Study Area Name	PIONEER TEL ASSN INC
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Catherine Moyer
<035> Contact Telephone Number - Number of person identified in data line <030>	6203563211 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	catherine.moyer@pioncomm.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)) (Yes/No)

(3014) If yes, does your company file the RUS annual report (Yes/No)

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

Name of Attached Document Listing Required Information

(3018) If the response is no on line 3014, is your company audited? (Yes/No)

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

411817ks3026.pdf

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
---	--

<010> Study Area Code	411817
<015> Study Area Name	PIONEER TEL ASSN INC
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Catherine Moyer
<035> Contact Telephone Number - Number of person identified in data line <030>	6203563211 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	catherine.moyer@pioncomm.net

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: PIONEER TEL ASSN INC	
Signature of Authorized Officer: CERTIFIED ONLINE	Date
Printed name of Authorized Officer: Catherine Moyer	
Title or position of Authorized Officer: General Manager/CEO	
Telephone number of Authorized Officer: 6203567133 ext.	
Study Area Code of Reporting Carrier: 411817	Filing Due Date for this form: 07/01/2014
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Certification - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	411817
<015> Study Area Name	PIONEER TEL ASSN INC
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Catherine Moyer
<035> Contact Telephone Number - Number of person identified in data line <030>	6203563211 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	catherine.moyer@pioncomm.net

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

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date:
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

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

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Attachments

REDACTED FOR PUBLIC INSPECTION
411817ks112

The Pioneer Telephone Association, Inc.
411817

Attachment—Line 112

Five Year Service Quality Improvement Plan

Attachment Redacted in Entirety

411817ks510

The Pioneer Telephone Association, Inc.
d/b/a
Pioneer Communications

QUALITY OF SERVICE & CUSTOMER PROTECTION PROCESSES
(For telephone, cable television and Internet service.)

1. **Available Customer Service Representatives to Assist Customers** – All calls received by Pioneer Communication during business hours, 8:00am to 5:00pm, are answered by a phone receptionist and transferred to an available customer service representative. Customer service representatives assist customers during this time. When the assigned customer service representatives are unable to answer calls, additional customer service help desk representatives are available to help answer phones.
2. **Provide a 24/7 Hour Customer Service Help Desk** – All calls are answered. Customer service help desk representatives assist customers from 12:00am to 11:59pm each day, except for Thanksgiving and Christmas. Issues, such as outages, requiring immediate attention are sent to the Pioneer Communications service technician on call, who works to resolve the matter as quickly as possible. If that technician is unable to resolve the problem, additional technicians are called. Unresolved issues are reviewed the following work day. Call logs are reviewed daily by personnel.
3. **Online Bill Payments** – Payments made online are posted to the customer's account promptly and are viewable on the customer's account within 24 hours. Any problems are reported to the senior manager, and resolved as quickly as possible.
4. **Customer Satisfaction Surveys to All Current Subscribers** – Surveys with questions regarding the areas of services and Pioneer Communications personnel are made available to customers to rate the company. These surveys are distributed by phone calls and paper. Results are returned to the senior management team for interpretation and to allow proper follow-up to customer issues.
5. **Give Customers Cut-off Warnings & Provide Bill Arrangement Opportunities** – Customers receive their monthly bill on or before the 1st of each month. The bill is due on the 15th of the month. If the bill goes unpaid, a late notice is sent on the 16th with a second due date of eleven days after the 15th (due on the 26th) and are instructed to pay by that date to avoid suspension. We will suspend a customer for non-payment on the 4th of the following month. If the 4th falls on a Friday or holiday, the suspension occurs the next business day. (Customers in danger of being suspended also receive a phone call from the customer service representatives before the 4th.) Customers with extenuating circumstances are allowed to arrange bill payment plans over a period of time to avoid being suspended.
6. **Ensure That All New Service Installation Orders Are Fulfilled Promptly** – At the time of install, a customer is given information about when the installation will occur, depending on the current installation schedule. If outside plant is already in place, the installation is

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completed customers' earliest convenience; if outside plant is in not in place, the installation is completed once the plant has been built.

7. **Minimize Customer Downtime for Services** – All trouble reports are handled the same day the report is received, including after normal working hours and on the weekend.
8. **Proactively Monitoring in Case of Major Service Outages** – Service technicians will be made aware of outages affecting customers within thirty minutes. It is the goal of Pioneer Communications to resolve major outages in four hours or less. If an outage has not been resolved within four hours, technicians will begin utilizing all resources, both from within and from outside.

CUSTOMER PRIVACY

Company Confidential Information Policy – Pioneer Communications has a company policy in place that holds employees accountable for a breach of confidentiality concerning customer data and company information. Employees are reminded that revealing any type of confidential information to unauthorized persons or tampering with or altering company records and/or property is a violation of trust that can result in disciplinary action up to and including discharge.”

Company CPNI Policy – Pioneer Communications also has a Customer Proprietary Network Information (CPNI) policy in place that ensures employee compliance with the FCC's CPNI guidelines. Outlined within the policy is a detailed description of CPNI as well as both acceptable and unacceptable CPNI practices. Employees are required to sign waivers stating they understand and agree to comply with the policy and acknowledge that failure to protect this information result in disciplinary action up to and including discharge. As a part of this policy, Pioneer Communications has designated a Compliance Officer responsible for training employees, monitoring CPNI related activities, and reporting breaches.

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PIONEER TELEPHONE ASSOCIATION, INC EMERGENCY SITUATION FUNCTIONALITY

AVAILABILITY OF BACK-UP POWER

Pioneer Telephone Association, Inc. owns and operates fifteen central office locations within the boundaries of its serving area. Each central office contains a diesel, natural gas or propane generation system and an automatic transfer switch. These systems are capable of providing sufficient back-up power for rectifiers, lighting and HVAC for lengthy outages of commercial power. Each generation system is inspected and manually exercised monthly by Pioneer personnel. Pioneer also services the generators annually and makes minor system repairs. Major system repairs are completed by manufacturer-certified technicians.

Remote subscriber terminals contain back-up battery systems to maintain service during commercial power outages. The batteries and power systems are periodically maintained and tested by qualified technicians. During extended commercial power outages, portable AC generators are available for use at sensitive or high-traffic terminals.

For fiber-to-the-home (FTTH) services, Optical Network Terminations at the customer premises are paired with battery back-up systems that are designed to sustain landline service during commercial power outages. For extended power outages, batteries are available for delivery to critical locations. System and battery statuses are monitored by the manufacturer's network monitoring software.

TRAFFIC ROUTING

Voice traffic between Pioneer's host central office switch and remote central office switches is delivered across an OC-48 SONET ring. This network utilizes two-fiber Bidirectional Line Switched Ring (BLSR) technology to allow continued connectivity in the event of a transport failure.

Voice traffic between Pioneer's host central office switch and upstream tandem switch is also transported across the Pioneer SONET ring. At the handoff point, two redundant OC-12 connections are connected between Pioneer's transport node and the upstream carrier.

NETWORK CAPACITY

Voice trunks and switching components are periodically monitored by Pioneer to ensure channel availability. Upstream carriers connected to Pioneer's network also perform their own utilization testing. The upstream carriers will increase or reduce channel capacity as necessary.

411817ks1200

FCC Form 481 – Carrier Annual Reporting

(1200) Terms and conditions for Lifeline Customers

Lifeline Service

Study Area Code:	411817
Study Area Name:	Pioneer Telephone Association, Inc.
Program Year:	2015
Contact Name - Person USAC should contact regarding this data:	Catherine Moyer
Contact Telephone Number - Number of person identified in data line <030>:	620.356.7133
Contact Email Address - Email Address of person identified in data line <030>:	catherine@pioncomm.net

Pioneer Telephone Association, Inc's, lifeline customers are offered our Advantage 240 plan, which is our basic local phone service and it provides up to 4 hours (240 minutes) of toll-free calling within the expanded regional calling area. The expanded regional calling area includes several communities in southwest Kansas. See attachment **Pioneer Expanded Regional Calling Area.pdf**, for the communities included in the expanded regional calling area. With the basic local telephone service the lifeline customer will also receive at no additional charge voice mail, calling number/calling number waiting caller ID, call waiting, call forwarding, 3-way calling and 8-list speed dial.

The basic local telephone service monthly rate is \$18.25 for both residential and business service. If a customer has made calls within the expanded regional calling area that are in excess of the allotted number of minutes (240), they will be billed at a rate of \$0.08 per minute.

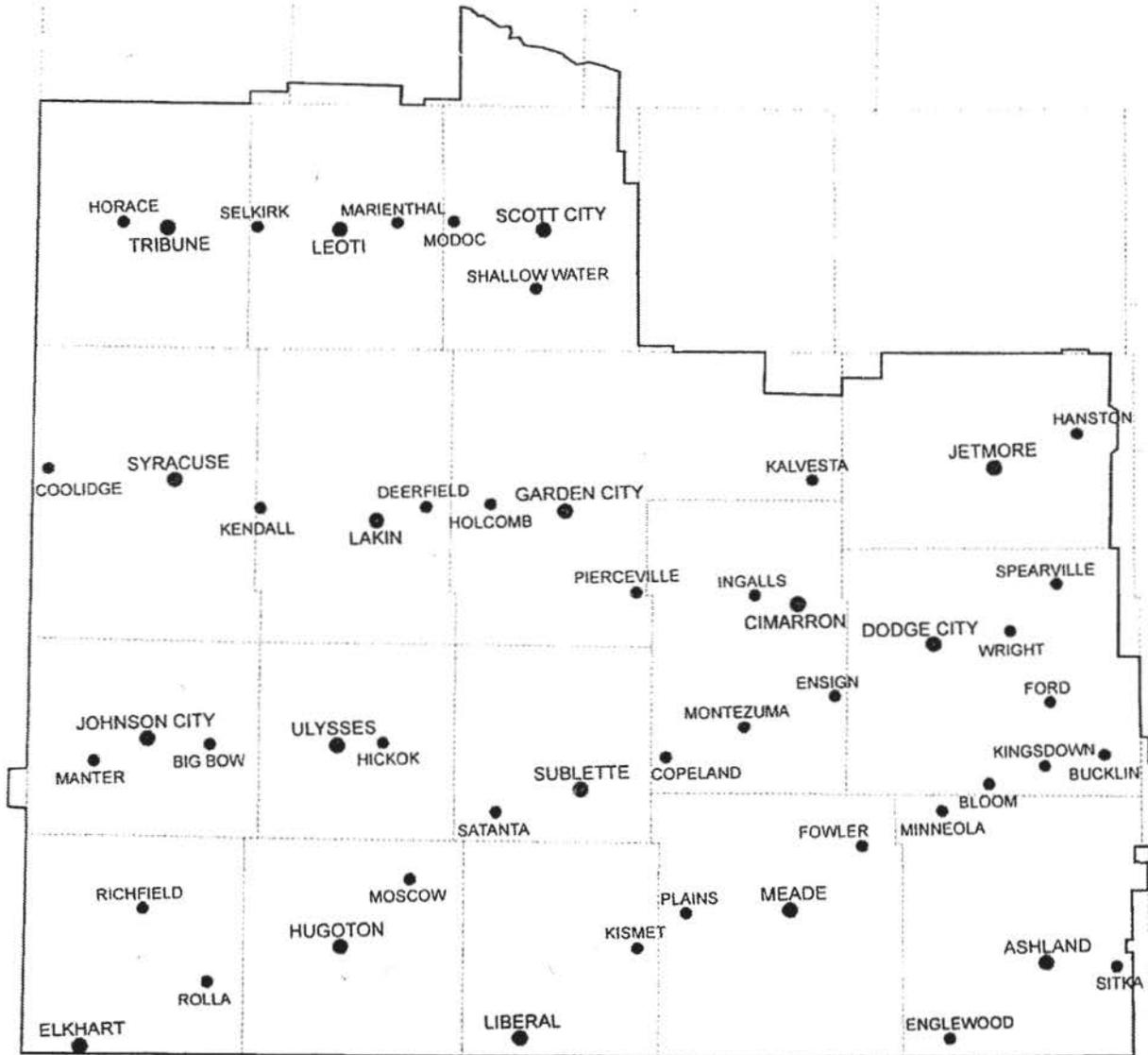
As far as toll charges for our lifeline customers, it depends on which carrier they choose and what they charge. Our customers do have the option at no additional charge, to be placed on toll restrict so they cannot make any long distance calls outside of the extended regional calling area.

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PIONEER COMMUNICATIONS advantage

The Pioneer Advantage expanded regional calling area includes the communities listed below with their associated dialing prefixes.

Pioneer Communications' telephone customers can place calls to these areas as they normally would a local call, with simple 7-digit dialing.



- Ashland (635, 518)
- Big Bow (495)
- Bloom (885)
- Bucklin (826)
- Cimarron (201, 219, 855)
- Coolidge (372)
- Copeland (668)
- Deerfield (426, 651)
- Dodge City (225, 227, 253, 255, 338, 339, 371, 390, 408, 430, 561, 682, 789, 801)
- Elkhart (360, 600, 697)
- Englewood (539)
- Ensign (865)
- Ford (369)
- Fowler (646)
- Garden City (260, 271, 272, 275, 276, 277, 287, 290, 521, 640, 765, 805, 937)
- Hanston (623)
- Hickok (353, 356, 424, 554, 575, 952)
- Holcomb (277)
- Horace (376, 927)
- Hugoton (428, 453, 541, 544)
- Ingalls (335)
- Jetmore (357, 393)
- Johnson (351, 492)
- Kalvesta (855)
- Kendall (373)
- Kingsdown (369)
- Kismet (563)
- Lakin (355, 436)
- Leoti (280, 375, 401)
- Liberal (309, 370, 391, 417, 482, 604, 621, 624, 626, 629, 655)
- Manter (493)
- Marienthal (379)
- Modoc (872)
- Meade (406, 873)
- Minneola (885)
- Montezuma (846)
- Moscow (595, 598)
- Pierceville (335)
- Plains (250, 563)
- Richfield (592)
- Rolla (593, 835)
- Ryus (657)
- Satanta (649, 746)
- Scott City (214, 781, 872, 874, 909)
- Selkirk (280, 375, 401)
- Shallow Water (872)
- Sitka (635)
- Spearville (385)
- Sublette (510, 675, 861)
- Syracuse (283, 384, 451, 499)
- Tribune (376, 927)
- Ulysses (353, 356, 424, 554, 575, 952)
- West Manter, CO (498)
- Wright (227)

Pioneer Advantage - Expanded Regional Calling Area

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The Pioneer Telephone Association, Inc.

411817

Attachment—Line 3026

Financials

Attachment Redacted in Entirety