



June 30, 2014

5929 Balcones Drive, Suite 200  
Austin, TX 78731-4280  
Phone: 512.343.2544  
Fax: 512.343.0119

**ERRATUM**

**VIA OVERNIGHT DELIVERY**

*Received & Inspected*

*JUL - 1 2014*

*FCC Mail Room*

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

**RE: Correction to FCC Form 481 - Delcambre Telephone Company, LLC**

Dear Ms. Dortch:

On Friday, June 27, 2014, in accordance with the annual reporting requirements of 47 C.F.R. §§54.313 and 54.422, Delcambre Telephone Company, LLC, Study Area Code 270428, submitted its FCC Form 481 to the Commission via the Electronic Comment Filing System (ECFS) in WC Docket Nos. 10-90 and 11-42. It also sent paper copies to the FCC via overnight delivery, seeking confidential treatment of certain portions of the filing. Both the ECFS and paper submissions inadvertently failed to include the attachment to Line 510 of Form 481 - Service Quality Standards and Consumer Protection Rules Compliance. This updated submission now includes the attachment to Line 510.

Please contact me if you have any questions.

Sincerely,

Stuart Polikoff  
Authorized Representative for  
Delcambre Telephone Company, LLC

SP/pjf

Enclosures

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

No. of Copies rec'd 0+1  
List ABCDE





5929 Balcones Drive, Suite 200  
Austin, TX 78731-4280  
Phone: 512.343.2544  
Fax: 512.343.0119

REDACTED – FOR PUBLIC INSPECTION

**VIA OVERNIGHT DELIVERY**

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June 27, 2014

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FCC Mail Room

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

RE: **REQUEST FOR CONFIDENTIAL TREATMENT** – *Connect America Fund*, WC Docket No. 10-90;  
*Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-42

Request that Information Submitted to the Commission be Withheld from Public Inspection Pursuant to 47 C.F.R. §0.459 and 5 U.S.C. §552(b)(4): Five-Year Service Quality Improvement Plan included in FCC Form 481

Confidential Financial Information – Subject to Protective Order in WC Docket Nos. 10-90, 07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WT Docket No. 10-208, Before the Federal Communications Commission

Dear Ms. Dortch:

In accordance with the annual reporting requirements of 47 C.F.R. §§54.313 and 54.422, Delcambre Telephone Company, LLC (“Delcambre” or “the Company”), Study Area Code 270428, 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. The Company, by its authorized representative, hereby requests confidential treatment of two attachments to its FCC Form 481: (1) the five-year service quality improvement plan and (2) the financial annual report, 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 Delcambre 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.

Ms. Marlene H. Dortch  
June 27, 2014  
Page 2 of 5

**Five-Year Service Quality Improvement Plan**

Pursuant to section 0.459 of the Commission's rules and Exemption 4 of FOIA, Delcambre requests that the text and data extracted from 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.

In accordance with section 0.459 of the Commission's rules, the following information is provided 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 access line counts, existing broadband capabilities, and its network investment plans through 2019 that will improve service quality for its 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 granular information on the Company's access line counts and existing broadband capabilities as well as detailed plans for financial investments in its network through 2019 to improve service to subscribers. This is closely guarded, privileged information that the 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 wireless Internet service providers. Most RLECs also face competition from at least one other wireline broadband provider such as a larger cable company, who will typically seek to "cherry pick" the lower cost portions of the study area. In addition, all RLECs face competition throughout their territories from satellite broadband providers.

Ms. Marlene H. Dortch  
June 27, 2014  
Page 3 of 5

(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 access line count, its existing broadband capabilities, and its strategic plans for network investments. This would give competitors invaluable confidential information with which to develop their own strategies for investing in the service area, thereby bringing substantial competitive harm to the Company.

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

The Company has continually treated the extracted information in its five-year plan as confidential and carefully controls the information to protect it from competitors. Access to the information is limited to employees that require it and to non-employees with confidentiality obligations such as lenders, consultants, auditors, and attorneys. In addition, when such information is required to be submitted to a state regulatory authority it has been filed as confidential information, not available to the public.

(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. Although the information reflects the Company's service improvement plans for a five year period, it would provide a very useful baseline for 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.



Ms. Marlene H. Dortch  
June 27, 2014  
Page 4 of 5

**Financial Annual Report**

Section 3005 of FCC Form 481 requires a privately-held rate-of-return carrier receiving high cost support to attach a full and complete annual report of the company's financial condition and operations pursuant to 47 C.F.R. §54.313(f)(2). Delcambre seeks confidential treatment of its financial annual report pursuant to the November 16, 2012 *Protective Order* in WC Docket No. 10-90, *et al.*<sup>1</sup> The *Protective Order* specifically covers information filed pursuant to 47 C.F.R. §54.313(f)(2).

Delcambre is providing to the Office of the Secretary, under seal, this cover letter and the Form 481 filing which includes the confidential information that is being requested to be withheld from public inspection.

Each page of the five-year service quality improvement plan confidential submission bears the legend, "CONFIDENTIAL - NOT FOR PUBLIC DISCLOSURE."

Each page of the financial annual report confidential submission bears the legend, "CONFIDENTIAL FINANCIAL INFORMATION - SUBJECT TO PROTECTIVE ORDER IN WC DOCKET NOS. 10-90, 07-135, 05-337, 03-109, CC DOCKET NOS. 01-92, 96-45, GN DOCKET NO. 09-51, WT DOCKET NO. 10-208, BEFORE THE FEDERAL COMMUNICATIONS COMMISSION."

Two copies of the Form 481 filing in redacted form and an accompanying cover letter are also being provided with the confidential filing. Each page of the redacted filing and accompanying cover letter is marked "REDACTED - FOR PUBLIC INSPECTION."

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.

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<sup>1</sup> *Connect America Fund et al.*, WC Docket No. 10-90 *et al.*, *Protective Order*, DA 12-1857 (rel. Nov. 16, 2012).



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Ms. Marlene Dortch  
June 27, 2014  
Page 5 of 5

This cover letter includes no confidential information and the text is the same in both the non-redacted and redacted versions except for the confidentiality markings.

Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Stuart Polikoff". The signature is written in a cursive style with a large, prominent "S" and "P".

Stuart Polikoff  
Authorized Representative for  
Delcambre Telephone Company, LLC

SP/pjf

Enclosures

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

Ms. Marcy Landry, Delcambre Telephone Company, LLC

<010> Study Area Code	270428
<015> Study Area Name	DELCAMBRE TEL CO
<020> Program Year	2015
<030> Contact Name: Person USAC should contact with questions about this data	Marcy Landry
<035> Contact Telephone Number: Number of the person identified in data line <030>	3376852311 ext.
<039> Contact Email Address: Email of the person identified in data line <030>	Mlandry@delcambre.net

Received & Inspected

JUL - 1 2014

FCC Mail Room

ANNUAL REPORTING FOR ALL CARRIERS

<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)	0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<310> Detail on Attempts (voice)	[Redacted]	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	(attach descriptive document)		
<320> Unfulfilled Service Requests (broadband)	0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<330> Detail on Attempts (broadband)	[Redacted]	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	(attach descriptive document)		
<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> 2704281a510.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> 2704281a610.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)?	(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> 2704281a1010.pdf	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1100> Terrestrial Backhaul (Y/N)?	(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

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000>	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<2005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet</b>			
<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"/>

<b>(100) Service Quality Improvement Reporting 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	270428
<015> Study Area Name	DELCAMBRE TEL CO
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Marcy Landry
<035> Contact Telephone Number - Number of person identified in data line <030>	3376852311 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	Mlandry@delcambre.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 "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.

2704281a112.pdf

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.














<010>	Study Area Code	270428
<015>	Study Area Name	DELCAMBRE TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Marcy Landry
<035>	Contact Telephone Number - Number of person identified in data line <030>	3376852311 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	Mlandry@delcambre.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 Conditions for Lifeline Customers  
Lifeline  
Data collection only

<010>	Study Area Code	270428
<015>	Study Area Name	DELCAMBRE TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Marcy Landry
<035>	Contact Telephone Number - Number of person identified in data line <030>	3376852311 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	Mlandry@delcambre.net

<1210> Terms & Conditions of Voice Telephony Lifeline Plans



Name of Attached Document

<1220> Link to Public Website

HTTP

"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.



<010>	Study Area Code	270428
<015>	Study Area Name	DELCAMBRE TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Marcy Landry
<035>	Contact Telephone Number - Number of person identified in data line <030>	3376852311 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	Mlandry@delcambre.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 (ROR) Additional Information  
Data collection ID: 3000  
Form 33  
© 2009-2010 U.S. Department of Justice

<010> Study Area Code	270428
<015> Study Area Name	DELCAMBRE TEL CO
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Marcy Landry
<035> Contact Telephone Number - Number of person identified in data line <030>	3376852311 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	Mlandry@delcambre.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

2704281a3026.pdf, 2704281a3026.xlsx

Name of Attached Document Listing Required Information



<010> Study Area Code	270428
<015> Study Area Name	DELCAMBRE TEL CO
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Marcy Landry
<035> Contact Telephone Number - Number of person identified in data line <030>	3376852311 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	Mlandry@delcambre.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. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	



<010> Study Area Code	270428
<015> Study Area Name	DELCAMBRE TEL CO
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Marcy Landry
<035> Contact Telephone Number - Number of person identified in data line <030>	3376852311 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	Mlandry@delcambre.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>Stuart Polikoff</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:	Stuart Polikoff
Name of Reporting Carrier:	DELCAMBRE TEL CO
Signature of Authorized Officer:	CERTIFIED ONLINE Date: 06/27/2014
Printed name of Authorized Officer:	Sybil Benoit
Title or position of Authorized Officer:	Manager
Telephone number of Authorized Officer:	3376852311 ext.
Study Area Code of Reporting Carrier:	270428 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:	DELCAMBRE TEL CO
Name of Authorized Agent or Employee of Agent:	Stuart Polikoff
Signature of Authorized Agent or Employee of Agent:	CERTIFIED ONLINE Date: 06/27/2014
Printed name of Authorized Agent or Employee of Agent:	Stuart Polikoff
Title or position of Authorized Agent or Employee of Agent:	Senior Director - Business Compliance
Telephone number of Authorized Agent or Employee of Agent:	5126527730 ext.
Study Area Code of Reporting Carrier:	270428 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





**LINE 112 – FIVE-YEAR SERVICE QUALITY IMPROVEMENT PLAN**

Delcambre Telephone Company, LLC (“the Company”) owns and operates one exchange in the town of Delcambre, located in the Iberia and Vermilion parishes in south-central Louisiana, in the Cajun Heartland of Acadiana. The Company serves approximately [REDACTED] residential and business access lines in a service area that is 21.43 square miles.



## **LINE 510 - SERVICE QUALITY STANDARDS AND CONSUMER PROTECTION RULES COMPLIANCE**

Delcambre Telephone Company, LLC ("the Company") complies with applicable service quality standards and consumer protection rules for its voice and broadband services.

The rates, terms, and conditions under which the Company operates are outlined in its local exchange tariff, which is approved by the Louisiana Public Service Commission ("Louisiana PSC"). The tariff contains provisions regarding the Company's customer service and protection practices.

Service quality standards for voice service are established by the Louisiana PSC. The Company consistently meets or exceeds those standards and provides reports to the Louisiana PSC, in accordance with the Louisiana PSC's rules.

With regard to broadband service, the Company provisions its network and equipment to ensure that its customers can enjoy the speeds to which they subscribe. However, Internet speeds generally result from a "best effort" service and are dependent upon a number of variables, many of which are outside the control of the Company.

The Company complies with any and all consumer protection obligations under state law.

The Company also complies with the following consumer best practices: (1) the Company discloses its rates and terms of service to customers; (2) the Company provides specific disclosures in its advertising; (3) the Company separately identifies carrier charges from taxes on its billing statements; (4) the Company provides ready access to customer service; (5) the Company promptly responds to consumer inquiries and complaints received from government agencies; and (6) the Company abides by policies for protection of consumer privacy.

Finally, the Company has a policy and established operating procedures that comply with the FCC's Customer Proprietary Network Information (CPNI) rules (47 C.F.R. §§64.2001-64.2011). Certification of the Company's compliance with CPNI rules and a description of the Company's operating procedures that ensure compliance are filed annually with the FCC.

## **LINE 610 - ABILITY TO FUNCTION IN EMERGENCY SITUATIONS**

Delcambre Telephone Company, LLC ("the Company") is capable of operating in emergency situations. Standby power generators are supplied at the central office, repeater sites, and video headend to ensure functionality without external power until such power is restored.

The Company is capable of repairing or replacing damaged facilities which it owns. These facilities include copper and fiber cable, utility poles, as well as network routers needed for the recovery of services. The Company is dependent upon AT&T for the rerouting of traffic around damaged facilities, as AT&T owns the facilities in the Company's central office that carry toll and Internet traffic. Although recovery may not be immediate after an emergency, there is a restoration plan in place for an expeditious recovery of services when the emergency has passed and it is safe for the needed repairs to be completed.

## **LINE 1010 – VOICE SERVICES RATE COMPARABILITY**

The Wireline Competition Bureau's most recent reasonable comparability benchmark for voice services is \$46.96, which includes the federal subscriber line charge ("SLC").<sup>1</sup>

The single-line residential local rate for all residential customers served by Delcambre Telephone Company, LLC ("the Company") is \$13.03. When the federal SLC (\$6.50) and the state SLC (\$1.00) are included, the rate becomes \$20.53. Therefore, the Company's pricing of fixed voice services is less than the reasonable comparability benchmark of \$46.96.

---

<sup>1</sup> *Wireline Competition Bureau Announces Results of Urban Rate Survey for Voice Services; Seeks Comment on Petition for Extension of Time to Comply With New Rate Floor*, WC Docket No. 10-90, DA 14-384 (rel. Mar. 20, 2014), p. 2.

## **LINE 1210 – TERMS & CONDITIONS OF VOICE TELEPHONY LIFELINE PLANS**

Residential customers of Delcambre Telephone Company, LLC (“the Company”) who qualify for the Lifeline Program receive a discount of \$9.25 on local voice telephony service.

For all of the Company’s Lifeline customers, the Lifeline single-line residential rate, including the federal subscriber line charge, is \$11.28 (\$20.53 standard rate - \$9.25 discount).

All single-line residential customers, including Lifeline customers, have an unlimited number of minutes for calls made within the local calling area.

Lifeline customers may purchase Local Optional Service (“LOS”) for a non-discounted rate of \$.97 plus \$.06/minute capped at \$15.00. LOS is a calling plan that encompasses areas within 40 miles of the Company’s local exchange area. Once a customer’s calls reach \$15, they will not be billed for any other calls within the 40 mile area. If usage is below the capped rate, the customer only pays for the calls made.

Lifeline customers may subscribe to long distance service offered by the Company at a non-discounted rate of \$.13/minute. Lifeline customers may also choose another long distance carrier. Lifeline customers may also elect to subscribe to toll blocking at no charge.

The Company offers bundled services to Lifeline customers that are discounted by \$9.25 for the voice component of the bundle.

Lifeline Program reductions do not apply to additional services such as information-related services and custom calling features. Lifeline customers may subscribe to these services at the same rates offered to other customers.

Additional information regarding the terms and conditions of voice telephony Lifeline plans can be found at [http://www.delcambre.net/telephone\\_life\\_line.html](http://www.delcambre.net/telephone_life_line.html).

**DELCAMBRE TELEPHONE CO., L.L.C.**

**FINANCIAL REPORT**

**DECEMBER 31, 2013**

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**BROUSSARD, POCHÉ, LEWIS & BREAUX, L.L.P.**  
**CERTIFIED PUBLIC ACCOUNTANTS**

4112 West Congress  
P.O. Box 61400  
Lafayette, Louisiana 70596-1400  
phone: (337) 988-4930  
fax: (337) 984-4574  
www.bplb.com

**Other Offices:**

Crowley, LA  
(337) 783-5693  
Opelousas, LA  
(337) 942-5217  
New Iberia, LA  
(337) 364-4554

**Partners:**

Frank A. Stagno, CPA\*  
Scott J. Broussard, CPA\*  
L. Charles Abshire, CPA\*  
P. John Blanchet, III, CPA\*  
Martha B. Wyatt, CPA\*  
Joey L. Breaux, CPA\*  
Craig J. Viator, CPA\*  
John L. Istre, CPA\*  
Elizabeth J. Moreau, CPA\*  
Lonnie J. Hebert, CPA\*  
Robert M. DeRouen, Jr. CPA\*

**Directors:**

Jason P. LeBlanc, CPA  
Laurel L. Montagnet, CPA  
Valeri A. Grayson, CPA

**Retired Partners:**

Sidney L. Broussard, CPA 1925-2005  
Leon K. Poché, CPA 1984  
James H. Breaux, CPA 1987  
Erma R. Walton, CPA 1988  
George A. Lewis, CPA 1992  
Geraldine J. Wimberley, CPA 1995  
Lawrence A. Cramer, CPA 1999  
Ralph Friend, CPA 2002  
Donald W. Kelley, CPA 2005  
George J. Trappey, III, CPA 2007  
Terrel P. Dressel, CPA 2007  
Herbert Lemoine II, CPA 2008  
Mary T. Miller, CPA 2011  
Mary A. Castille, CPA 2013

**INDEPENDENT ACCOUNTANTS' REVIEW REPORT**

To the Board of Directors  
Delcambre Telephone Co., L.L.C.  
Delcambre, Louisiana

We have reviewed the accompanying balances sheet of Delcambre Telephone Co., L.L.C. as of December 31, 2013 and 2012, and the related statements of income, members' equity, and cash flows for the years then ended. A review includes primarily applying analytical procedures to management's financial data and making inquiries of Company management. A review is substantially less in scope than an audit, the objective of which is the expression of an opinion regarding the financial statements as a whole. Accordingly, we do not express such an opinion.

Management is responsible for the preparation and fair presentation of the financial statements in accordance with accounting principles generally accepted in the United States of America and for designing, implementing, and maintaining internal control relevant to the preparation and fair presentation of the financial statements.

Our responsibility is to conduct the review in accordance with Statements on Standards for Accounting and Review Services issued by the American Institute of Certified Public Accountants. Those standards require us to perform procedures to obtain limited assurance that there are no material modifications that should be made to the financial statements. We believe that the results of our procedures provide a reasonable basis for our report.

Based on our reviews, with the exception of the matter described in the following paragraph, we are not aware of any material modifications that should be made to the accompanying financial statements in order for them to be in conformity with accounting principles generally accepted in the United States of America.

As disclosed in Note 1 to the financial statements, accounting principles generally accepted in the United States of America would require the Company to consolidate its financial statements with its wholly owned subsidiary, Delcambre Cellular L.L.C. The Company's management has informed us that the Company is reporting the investment in its subsidiary using the cost method of accounting.

*Broussard, Poché, Lewis & Breaux, LLP*

Lafayette, Louisiana  
June 26, 2014

DELCAMBRE TELEPHONE COMPANY, L.L.C.

BALANCE SHEETS  
December 31, 2013 and 2012

ASSETS	<u>2013</u>	<u>2012</u>
<b>CURRENT ASSETS</b>		
Cash and cash equivalents		
Certificate of deposits		
Accounts receivable		
Inventory		
Prepaid insurance		
Other current assets		
Total current assets		
<b>INVESTMENTS</b>		
<b>PROPERTY AND EQUIPMENT</b>		
Land		
Depreciable assets, net of accumulated depreciation		
Total property and equipment		
<b>TOTAL ASSETS</b>		
 <b>LIABILITIES AND MEMBERS' EQUITY</b>		
<b>CURRENT LIABILITIES</b>		
Accounts payable		
Accrued expenses		
Total current liabilities		
<b>OTHER LIABILITIES</b>		
Due to related parties		
Total liabilities		
<b>MEMBERS' EQUITY</b>		
<b>TOTAL LIABILITIES AND MEMBERS' EQUITY</b>		

See Accompanying Notes and Independent Accountants' Review Report.

DELCAMBRE TELEPHONE COMPANY, L.L.C.

STATEMENTS OF INCOME  
 Years Ended December 31, 2013 and 2012

	<u>2013</u>	<u>2012</u>
Income:		
Local network services		
Long distance network services		
Other regulated revenue		
Non-regulated revenue		
Total operating revenue		
Operating expenses:		
Plant specific expense		
Plant nonspecific expense		
Depreciation		
Customer operation expense		
Corporate operation expense		
Total operating expenses		
Operating loss		
Other income (expense):		
Interest income		
Bad debt		
Total other income (expense), net		
Net loss		

See Accompanying Notes and Independent Accountants' Review Report.

DELCAMBRE TELEPHONE COMPANY, L.L.C.

STATEMENTS OF MEMBERS' EQUITY  
Years Ended December 31, 2013 and 2012

	<u>2013</u>	<u>2012</u>
Members' equity, beginning		
Net loss		
Members' equity, ending		

See Accompanying Notes and Independent Accountants' Review Report.

DELCAMBRE TELEPHONE COMPANY, L.L.C.

STATEMENTS OF CASH FLOWS  
 Years Ended December 31, 2013 and 2012

	<u>2013</u>	<u>2012</u>
<b>CASH FLOWS FROM OPERATING ACTIVITIES</b>		
Net loss		
Adjustments to reconcile net loss to net cash provided by operating activities:		
Depreciation		
(Increase) decrease in current assets -		
Accounts receivable		
Inventory		
Prepaid expenses		
Other current assets		
Increase (decrease) in current liabilities -		
Accounts payable		
Accrued expenses		
Net cash provided by operating activities		
<b>CASH FLOWS FROM INVESTING ACTIVITIES</b>		
Payments for the purchase of property and equipment		
Redemption of certificates of deposit		
Purchase of certificates of deposit		
Net cash used in investing activities		
Net decrease in cash and cash equivalents		
Cash and cash equivalents at beginning of year		
Cash and cash equivalents at end of year		

See Accompanying Notes and Independent Accountants' Review Report.

DELCAMBRE TELEPHONE CO., L.L.C.

NOTES TO FINANCIAL STATEMENTS  
See Independent Accountants' Review Report

Note 1. Accounting Policies

This summary of significant accounting policies of Delcambre Telephone Co., L.L.C., (the "Company") is presented to assist in understanding the Company's financial statements. The financial statements and notes are representations of the Company's management who are responsible for their integrity and objectivity.

Nature of operations:

Delcambre Telephone is an incumbent local exchange carrier. The Company provides local phone service and digital subscriber line ("DSL") over copper as well as telephone, broadband and video over fiber to the community of Delcambre Louisiana and its surrounding area.

Basis of Accounting:

The Company's policy is to prepare its financial statements on the accrual basis of accounting; consequently, revenues are recognized when earned rather than when received, and expenses are recognized when the obligation incurred rather than when cash is disbursed.

Use of estimates:

The preparation of financial statements in conformity with generally accepted accounting principles requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities and disclosure of contingent assets and liabilities at the date of the financial statements and the reported amounts of revenue and expenses during the reporting period. Actual results could differ from those estimates.

Cash and cash equivalents:

For purposes of reporting cash flows, the Company considers all highly liquid debt instruments purchased with an original maturity of three months or less to be cash equivalents.

Receivables:

Accounts receivable are recorded at net realizable value. The Company provides provisions for uncollectible accounts receivable based upon factors surrounding the credit risk and activity of specific customers, historical trends and other information. The allowance is reviewed periodically and adjusted for accounts deemed uncollectible by management. After all attempts to collect a receivable have failed, the receivable is written off against the allowance. The Company has determined that the amount of allowance as of December 31, 2013 and 2012 are immaterial.

Property and depreciation:

Property and equipment are carried at cost. Assets are depreciated over their estimated useful life using the straight-line method. When property and equipment are retired, the related costs and accumulated depreciation are removed from the respective accounts and the net gain or loss is reflected in income.

Income taxes:

As a limited liability company, the Company's taxable income or loss is allocated to members in accordance with their respective percentage ownership. Therefore, no provision or liability for income taxes has been included in the financial statements.

NOTES TO FINANCIAL STATEMENTS

The Financial Accounting Standards Board issued new guidance on accounting for uncertainty in income taxes. The Company adopted this new guidance for the year ended December 31, 2012. Management evaluated the Company's tax positions and concluded that the Company had taken no uncertain tax positions that require adjustment to the financial statements to comply with the provisions of this guidance. With few exceptions, the Company is no longer subject to income tax examinations by the U.S. federal or state tax authorities for years before 2010.

Accounting for wholly owned subsidiaries:

Accounting Standards Codification 810, *Consolidation*, provides that the purpose of consolidated financial statements is to present, primarily for the benefit of the owners and creditors of the parent, the results of operations and the financial position of a parent company and all its subsidiaries as if the consolidated group were a single economic entity. There is a presumption that consolidated financial statements are more meaningful than separate financial statements and that they are usually necessary for a fair presentation when one of the entities in the consolidated group directly or indirectly has a controlling financial interest in the other entities. Accordingly, under ASC 810, all subsidiaries - that is, all entities in which a parent has a controlling financial interest - should be consolidated. The Company accounts for its investment in its wholly owned subsidiary on the cost basis of accounting.

Note 2. Investments

At December 31, 2013, the Company had investments in the following entities:

- Investment in Delcambre Cellular, L.L.C.
- Investment in NECA



Both investments are accounted for on the cost method of accounting; whereby only dividends received are recorded as income.

Note 3. Property, Equipment and Depreciation

The major classes of property and equipment, depreciation expenses and accumulated depreciation are as follows as of December 31, 2013 and 2012:

Class	2013		
	Cost	Depreciation	Accumulated Depreciation
Buildings			
Motor vehicles			
Special purpose vehicles			
Furniture and office equipment			
Computer software			
Poles			
Equipment cable, and wire			



NOTES TO FINANCIAL STATEMENTS

Class	2012	
	Cost	Accumulated Depreciation
Buildings		
Motor vehicles		
Special purpose vehicles		
Furniture and office equipment		
Computer software		
Poles		
Equipment cable, and wire		

Note 4. Concentration of Credit Risk

All of the Company's income is derived from providing cellular, internet, and cable services to local individuals and businesses in the geographic region in and around Delcambre, Louisiana.

Throughout the year, the Company may have cash on deposit with local financial institutions in excess of FDIC insurance coverages. The Company does not anticipate any loss as a result of uninsured amounts.

Note 5. Related Parties

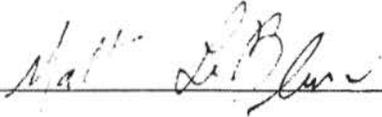
As of December 31, 2013 and 2012, the Company has a payable to Delcambre Cellular, L.L.C., a wholly owned subsidiary in the amount of [REDACTED]

Note 6. Subsequent Events

The Company evaluated the need for disclosures and/or adjustments resulting from subsequent events through June 26, 2014 the date of the financial statements were available to be issued. This evaluation did not result in any subsequent events that necessitated disclosures and/or adjustments under general accounting standards.

**OFFICER CERTIFICATION**  
pursuant to  
**47 C.F.R. §54.313(f)(2)**

I, Matt LeBlanc, President of Delcambre Telephone Company, LLC, hereby certify that Delcambre Telephone Company was (a) not audited in the ordinary course of business for fiscal year 2013, and (b) that the reported data are accurate.



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Matt LeBlanc  
President  
Delcambre Telephone Company, LLC  
Study Area Code 270428  
(337) 685-2311