



Your business is our business.

REDACTED - FOR PUBLIC INSPECTION

7852 Walker Drive, Suite 200
Greenbelt, Maryland 20770
phone: 301-459-7590, fax: 301-577-5575
internet: www.jsitel.com, e-mail: jsi@jsitel.com

June 27, 2014

Accepted/Files

JUN 27 2014

Federal Communications Commission
Office of the Secretary

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 Horry Telephone Cooperative, Inc.
Study Area Code 240528**

Dear Ms. Dortch:

On behalf of Horry Telephone Cooperative, Inc. ("Horry"), 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 Horry seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.² The redacted version is also being filed this date via the FCC's Electronic Comment Filing System. In addition, attached is a letter requesting confidential treatment under Sections 0.457 and 0.459 of the initial section 54.202(a) Five-Year Service Quality Improvement Plan.³

Please direct any questions regarding the filing to the undersigned.

Sincerely,

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

cc: Charles Tyler, Telecommunications Access Policy Division (two copies, confidential)

No. of Copies rec'd 0+3
List ABCDE

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).

Echelon Building II, Suite 200
9430 Research Blvd., Austin, TX 78759
phone: 512-338-0473, fax: 512-346-0822

Eagandale Corporate Center, Suite 310
1380 Corporate Center Curve, Eagan, MN 55121
phone: 651-452-2660, fax: 651-452-1909

6849 Peachtree Dunwoody Road
Bldg. B-3, Suite 200, Atlanta, GA 30328
phone: 770-569-2105, fax: 770-410-1608

547 South Oakview Lane
Bountiful, UT 84010
phone: 801-294-4576, fax: 801-294-5124



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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 Horry Telephone Cooperative, Inc.
Study Area Code 240528
Request for Confidentiality**

Dear Ms. Dortch:

John Staurulakis, Inc. (“JSI”), on behalf of its client Horry Telephone Cooperative, 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. Information of this nature is confidential commercial information routinely withheld from public inspection.

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).

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phone: 801-294-4576, fax: 801-294-5124

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 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

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).

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	240528
<015>	Study Area Name	HORRY TEL COOP
<020>	Program Year	2015
<030>	Contact Name: Person USAC should contact with questions about this data	Scott Goff
<035>	Contact Telephone Number: Number of the person identified in data line <030>	8433698597 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	scott.goff@htcinc.net

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Federal Communications Commission
Office of the Secretary

ANNUAL REPORTING FOR ALL CARRIERS	54,313 Completion Required	54,422 Completion Required
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<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)			
<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>	240528SC510.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>	240528SC610.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>	[Redacted]	(attach descriptive document)	<input 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 type="checkbox"/>	<input checked="" type="checkbox"/>
<2005>	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet

<3000>	(check to indicate certification)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<3005>	(complete attached worksheet)	<input 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	240528
<015>	Study Area Name	HORRY TEL COOP
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Scott Goff
<035>	Contact Telephone Number - Number of person identified in data line <030>	8433698597 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	scott.goff@hteinc.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.

240528SC112.pdf

Name of Attached Document

Please check these boxes below to confirm that the attached documents(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	240528
<015>	Study Area Name	HORRY TEL COOP
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Scott Goff
<035>	Contact Telephone Number - Number of person identified in data line <030>	8433698597 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	scott.goff@htcinc.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
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<010> Study Area Code	240528
<015> Study Area Name	HORRY TEL COOP
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Scott Goff
<035> Contact Telephone Number - Number of person identified in data line <030>	8433698597 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	scott.goff@htcinc.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	FCC Form 481
Lifeline	OMB Control No. 3060-0986/OMB Control No. 3060-0819
Data Collection Form	July 2013

<010>	Study Area Code	240528
<015>	Study Area Name	HORRY TEL COOP
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Scott Goff
<035>	Contact Telephone Number - Number of person identified in data line <030>	8433698597 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	scott.goff@htcinc.net

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

240528SC1210.pdf

Name of Attached Document

<1220> Link to Public Website

HTTP <http://www.htcinc.net/stay-connected/>

"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
--	--

<010>	Study Area Code	240528
<015>	Study Area Name	HORRY TEL COOP
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Scott Goff
<035>	Contact Telephone Number - Number of person identified in data line <030>	8433698597 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	scott.goff@htcinc.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

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(3000) Rate Of Return Carrier Additional Documentation

FCC Form 481

Data Collection Form

OMB Control No. 3060-0985/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	240528
<015>	Study Area Name	HORRY TEL COOP
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Scott Goff
<035>	Contact Telephone Number - Number of person identified in data line <030>	8433698597 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	sgoff@htcinc.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

240528SC3026 .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
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<010>	Study Area Code	240528
<015>	Study Area Name	HORRY TEL COOP
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Scott Goff
<035>	Contact Telephone Number - Number of person identified in data line <030>	8433698597 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	scott.goff@htcinc.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:	
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:
<small>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.</small>	

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	240528
<015> Study Area Name	HORRY TEL COOP
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Scott Goff
<035> Contact Telephone Number - Number of person identified in data line <030>	8433698597 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	scott.goff@htcinc.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>Carlton Lewis</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:	Carlton Lewis
Name of Reporting Carrier:	HORRY TEL COOP
Signature of Authorized Officer:	CERTIFIED ONLINE Date: 06/25/2014
Printed name of Authorized Officer:	Carlton Lewis
Title or position of Authorized Officer:	CFO
Telephone number of Authorized Officer:	8433652151 ext.
Study Area Code of Reporting Carrier:	240528 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:	HORRY TEL COOP
Name of Authorized Agent or Employee of Agent:	John Staurulakis, Inc.
Signature of Authorized Agent or Employee of Agent:	CERTIFIED ONLINE Date: 06/25/2014
Printed name of Authorized Agent or Employee of Agent:	Mark A. Ozanick
Title or position of Authorized Agent or Employee of Agent:	Staff Consultant
Telephone number of Authorized Agent or Employee of Agent:	7705692105 ext.
Study Area Code of Reporting Carrier:	240528 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.	

REDACTED FOR PUBLIC INSPECTION

Attachments

REDACTED – FOR PUBLIC INSPECTION

HORRY TELEPHONE COOPERATIVE, INC. (SAC 240528)

ATTACHMENT - LINE 112

FIVE YEAR SERVICE QUALITY IMPROVEMENT PLAN

ATTACHMENT REDACTED IN ENTIRETY

Horry Telephone Cooperative, Inc.'s demonstration of complying with applicable service quality standards and consumer protection rules for voice and broadband services:

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

Horry Telephone Cooperative, Inc. (“Horry”) hereby certifies that it is in compliance with applicable service quality standards and consumer protection rules. Horry is subject to consumer protection obligations under both federal and South Carolina state law. These obligations include, but are not limited to, the following: (1) filing a Local Exchange Tariff pursuant to the requirements of the Public Service Commission of South Carolina which disclose rates, and terms and conditions of service to customers (Section 103-612.2.1 of the South Carolina Code of Regulations); (2) adherence to state consumer protection requirements governing telephone providers which govern Standards and Quality of Service (Sections 103-661, 103-662, and 103-663 of the South Carolina Code of Regulations); Customer Relations, including billing, deposits,

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.

discontinuance and termination of service (Sections 103-620 through 103-633 of the South Carolina Code of Regulations); Engineering and Safety Standards (Sections 103-640 through 103-646 and 103-670 through 103-672 of the South Carolina Code of Regulations); Inspections and Tests (Sections 103-650 through 103-653 of the South Carolina Code of Regulations); Records and Reports (Sections 103-610 through 103-619 of the South Carolina Code of Regulations) and Customer Complaints (Section 103-628 of the South Carolina Code of Regulations); (3) truth-in-billing requirements (Section 103-622.1 of the South Carolina Code of Regulations); and (4) CPNI, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

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

Horry Telephone Cooperative's demonstration of ability to function in emergency situations for voice and broadband services:

Horry Telephone Cooperative, Inc. ("Horry") hereby certifies that it is able to function in emergency situations as set forth in 47 C.F.R. § 54.202(a)(2)¹ and Section 103-646 of the South Carolina Code of Regulations. Horry's network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2) and Section 103-646 of the South Carolina Code of Regulations. Horry can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow Horry to manage traffic spikes throughout its network, as emergency situations require. In addition, Horry has redundancy for connectivity purposes *via* additional routes and electronic equipment for voice and broadband services.

Specifically, each central office building is supplied with standby generators and battery back-up that enable the central office to keep running until power is restored so long as fuel is available, or until system changes are made to reroute traffic. Horry 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 Horry has access to fuel.

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

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3. BASIC LOCAL EXCHANGE SERVICE

3.6 Lifeline

3.6.1 Description of Service

- A. The Lifeline Program is a federally mandated telephone assistance program designed to make telephone service available at reduced rates to eligible low-income residential customers. Basic terms and conditions are in compliance with the FCC's Order on Universal Service in CC Docket No. 97-157, which adopts the Federal-State Joint Board's recommendation in CC Docket No. 96-45, which complies with the Telecommunication Act of 1996. Specific terms and conditions are as prescribed by the South Carolina Public Service Commission and are as set forth in this Tariff.
- B. The Lifeline credit available to an eligible customer in South Carolina is equal to the total of federal support as established by the Federal Communications Commission and state support as established by the Public Service Commission of South Carolina. The amount of credit will not exceed the charge for local service, which includes the access line, the Subscriber Line Charge and local usage. C
- C. Lifeline is supported by the Federal Universal Service support mechanism.

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3. BASIC LOCAL EXCHANGE SERVICE

3.6 Lifeline (Continued)

3.6.2 Regulations

A. General

1. Lifeline Assistance is a non-transferable retail service offering for which qualifying low-income subscribers pay reduced charges, as provided for below. Lifeline Assistance enables eligible residential subscribers to pay reduced charges for voice telephony service that includes the following services: voice-grade access to the public switched network; local usage; access to emergency services; and toll limitation. C
2. A Lifeline customer may subscribe to any local service offering available to other residential customers.
3. The Lifeline Program rate reduction does not apply to Service Connection Charges. C
4. The Lifeline Program rate will not be available on a retroactive basis.

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3. BASIC LOCAL EXCHANGE SERVICE

3.6 Lifeline (Continued)

3.6.2 Regulations (Continued)

A. General (Continued)

5. Toll blocking, if elected, will be provided at no charge to the Lifeline customer.
6. The deposit requirement is not applicable to a Lifeline customer who subscribes to toll blocking. If a Lifeline customer removes toll blocking prior to establishing an acceptable credit history, a deposit may be required. When applicable, advance payments will not exceed the connection and local service charges for one month.
7. A Lifeline customer's local service will not be disconnected for non-payment of regulated toll charges. Local service may be denied for non-payment of local calls in accordance with Section 2 of this Tariff. Access to toll service may be denied for non-payment of regulated tolls. A Lifeline customer's request for reconnection of local service will not be denied if the service was previously denied for non-payment of toll charges.

B. Eligibility Requirements

1. To be eligible for a Lifeline credit, a customer's household income must be at or below 135 percent of the Federal Poverty Guidelines or be a current recipient, or have a dependent in their household that's a recipient, of any one of the following qualifying programs. C
 - a. Temporary Assistance for Needy Families (TANF) C
 - b. Supplemental Nutrition Assistance Program (SNAP), formerly known as Food Stamps
 - c. Medicaid
 - d. Supplemental Security Income (SSI)
 - e. Federal Public Housing Assistance
 - f. Low-Income Home Energy Assistance Program (LIHEAP)
 - g. National School Lunch Program's free lunch program
2. Other eligibility requirements may be established by the Commission. C

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3. BASIC LOCAL EXCHANGE SERVICE

3.6 Lifeline (Continued)

3.6.2 Regulations (Continued)

C. Certification

1. Each subscriber to Lifeline Assistance must provide documentation of income-based or program-based eligibility and certify in writing to the Cooperative, under penalty of perjury, that the subscriber receives benefits under a program outlined in paragraph B above, and must on that same document, agree to notify the Cooperative if the subscriber ceases to participate in the program(s) or to meet income eligibility requirements. The Cooperative shall retain all such subscriber certification in order to furnish proof of subscriber eligibility as may be required from time to time by state and federal Lifeline administrators. The Lifeline credit will not be established until the Cooperative has received proof of eligibility. If the customer requests service installation prior to the Cooperative's receipt of proof of eligibility, the requested service will be provided without the Lifeline credit. When eligibility documentation is provided subsequent to installation, the Lifeline credit will be provided on a going-forward basis. C
2. The Cooperative reserves the right to periodically audit its records, working in conjunction with the appropriate state and federal agencies, for the purpose of determining continuing eligibility. Information obtained during such audit will be treated as confidential information to the extent required under state and federal laws. The use or disclosure of information concerning enrollees will be limited to purposes directly connected with the administration of the Lifeline program.
3. When a customer is determined to be ineligible as a result of an audit, the Cooperative will contact the customer. If the customer cannot provide eligibility documentation, the Lifeline credit will be discontinued.
4. Resellers providing Lifeline service from this Tariff are responsible for determining proof of eligibility prior to requesting the service. Disclosure requirements described in 2. preceding are applicable to resellers of Lifeline service.
5. Lifeline customers must recertify annually in order to continue qualifying for discounted services under the Lifeline program. N

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3. BASIC LOCAL EXCHANGE SERVICE

3.6 Lifeline (Continued)

3.6.3 Rates and Charges

A. General

1. Lifeline is provided as a monthly credit on the eligible residential subscriber's access line bill for local service.
2. Service Charges in Section 4 of this Tariff are applicable for installing or changing Lifeline service.
3. Deleted D
4. The Service Charges in Section 4 are not applicable when existing service is converted intact to Lifeline.

B. The total Lifeline credit consists of one federal credit plus one state credit.

	Monthly Credit	
1. Federal Credit	\$9.25	R
2. State Credit	\$ 3.50	

GENERAL CUSTOMER SERVICES TARIFF

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3. BASIC LOCAL EXCHANGE SERVICE

3.6 Lifeline (Continued)

3.6.3 Rates and Charges (Continued)

C. Service Connection Charges

1. Service Charges do not apply to eligible customers with existing Residential Local Exchange Service when they convert to Lifeline.
2. Service Connection Charges will apply when:
 - a. Existing eligible residential Local Exchange Service customers also convert to a different class of eligible residential service and/or optional calling service(s) at the time the Lifeline billing is initiated.
 - b. A customer receiving Lifeline billing voluntarily elects to convert to telephone service arrangements, which preclude Lifeline eligibility.
3. Any subsequent moves or changes after the initial connection to the Lifeline service will be subject to the applicable Service Charges as outlined in Section 4 of this Tariff.

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3. BASIC LOCAL EXCHANGE SERVICE

3.2 Exchange Access Line Service

The following schedule of rates is applicable to basic flat rate exchange access line service. The rates specified herein entitle subscribers to an unlimited number of calls to all exchange access lines bearing the designations of central offices within the serving exchange and basic service area additional exchanges listed in Section 3.2.2 of this Tariff. Subscribers may also subscribe to a basic flat rate exchange access line service that provides an unlimited number of calls to only those access lines within the same exchange (intra-exchange) of the subscriber.

3.2.1	Rates and Charges	Monthly Rate	
A.	Residence		
	1. Exchange Access Line - One Party	\$13.50	
	2. Exchange Access Line – One Party (Intra-exchange)	\$ 8.50	N
B.	Business		
	1. Exchange Access Line – One Party	\$24.00	
C.	Key System		
	1. Key System Line	\$24.00	
D.	Private Branch Exchange (PBX) Trunks	\$24.00	
	1. Combination	\$24.00	
	2. Inward Only	\$24.00	
	3. Outward Only	\$24.00	
	4. Direct Inward Dialing (DID)	\$24.00	

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3. BASIC LOCAL EXCHANGE SERVICE

3.2 Exchange Access Line Service (Continued)

3.2.1 Rates and Charges (Continued)

	Monthly Rate	
E. Exchange Sharing and Resale Trunks – Message Rate Service		
1. Per Trunk	\$24.50	
2. Per Local Message	\$ 0.12	
F. Public Telephone Access Service (PTAS)		
1. Exchange Access Line	\$ 24.00 ¹	I
2. Deleted		D
G. Network Access Register (NAR)		
1. Centrex Service		
a. Combination	\$ 10.00	
b. One-way incoming	\$ 10.00	
c. One-way outgoing	\$ 10.00	
2. Net Link™ Channel Service		
a. Combination	\$ 10.00	
b. One-way incoming	\$ 10.00	
c. One-way outgoing	\$ 10.00	

¹ The PTAS Exchange Access Line rate is to mirror the Business Exchange Access Line One-Party rate as a result of the mediated settlement in S.C. Public Service Commission Docket No. 97-186-C.

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3. BASIC LOCAL EXCHANGE SERVICE

3.2. Exchange Access Line Service (Continued)

3.2.2 Local Calling Areas

The rates and charges specified in Section 3.2.1 entitle customers to access all stations bearing the central office designations of additional exchanges as shown below. The local calling area of the exchanges in the left-hand column also includes the exchanges listed under the Additional Exchanges column. Extended Area Service (EAS) may be provided by the Cooperative exclusively, or may include the joint efforts of the Cooperative and other local exchange carriers.

<u>Serving Exchange</u>	<u>Additional Exchanges (EAS)</u>
Aynor	Conway East Conway North Conway South Conway
Collins Creek	Lakewood Long Bay Murrells Inlet Myrtle Beach Ocean View West Myrtle Beach
East Conway	Aynor Conway North Conway South Conway Wampee West Myrtle Beach
Floyds	Fair Bluff Loris Mullins Nichols
Lakewood	Collins Creek Long Bay Murrells Inlet Myrtle Beach Ocean View West Myrtle Beach

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3. BASIC LOCAL EXCHANGE SERVICE

3.2. Exchange Access Line Service (Continued)

3.2.2 Local Calling Areas (Continued)

<u>Serving Exchange</u>	<u>Additional Exchanges (EAS)</u>
Loris	Floyds Tabor City Wampee
Murrells Inlet	Collins Creek Lakewood Long Bay Myrtle Beach Ocean View West Myrtle Beach Pawleys Island
North Conway	Aynor Conway East Conway South Conway Wampee
South Conway	Aynor Conway East Conway North Conway Wampee
Wampee	Conway East Conway Loris North Myrtle Beach North Conway South Conway

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3. BASIC LOCAL EXCHANGE SERVICE

3.2. Exchange Access Line Service (Continued)

3.2.2 Local Calling Areas (Continued)

Serving Exchange

Additional Exchanges (EAS)

West Myrtle Beach

Collins Creek
East Conway
Lakewood
Long Bay
Myrtle Beach
Ocean View
Murrells Inlet

3.2.3 Exchange Mileage Charges

- A. No exchange mileage charges shall apply to calls completed to Extended Area Service additional exchanges.
- B. No zone charges shall apply to calls completed to Extended Area Service additional exchanges.

REDACTED – FOR PUBLIC INSPECTION

HORRY TELEPHONE COOPERATIVE, INC. (SAC 240528)

ATTACHMENT - LINE 3026

ATTACHMENT REDACTED IN ENTIRETY