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Austin, TX 78731-4280
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Fax: 512.343.0119

REDACTED - FOR PUBLIC INSPECTION

VIA OVERNIGHT DELIVERY

June 30, 2014

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

Received & Inspected

JUL - 1 2014

FCC Mailroom

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, Valliant Telephone Company (the Company), Study Area Code 432032, 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 Valliant Telephone Company 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.

No. of Copies rec'd 07
List ABCDE

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Five-Year Service Quality Improvement Plan

Pursuant to section 0.459 of the Commission's rules and Exemption 4 of FOIA, Valliant Telephone Company 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.

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(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.

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). Valliant Telephone Company seeks confidential treatment of its financial annual report pursuant to the November 16, 2012 *Protective Order* in WC Docket No. 10-90, *et al.*¹ The *Protective Order* specifically covers information filed pursuant to 47 C.F.R. §54.313(f)(2).

¹ *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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Valliant Telephone Company 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.

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 "Deb Morgan". The signature is written in a cursive, flowing style.

Deb Morgan
Authorized Representative for
Valliant Telephone Company

DM/pjf

Enclosures

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

Mr. Robert Prince, Valliant Telephone Company
Mr. Tommy Dorries, Valliant Telephone Company

<010> Study Area Code	432032
<015> Study Area Name	VALLIANT TEL CO
<020> Program Year	2015
<030> Contact Name: Person USAC should contact with questions about this data	Tommy Dorries
<035> Contact Telephone Number: Number of the person identified in data line <030>	5809334400 ext.
<039> Contact Email Address: Email of the person identified in data line <030>	tdorries@valliant.net

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)	<div style="border: 1px solid black; height: 40px; width: 100%;"></div>	<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)	<div style="border: 1px solid black; height: 40px; width: 100%;"></div>	<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		<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> <div style="border: 1px solid black; padding: 2px;">432032ok510.pdf</div>	(attached descriptive document)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<600> Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<610> <div style="border: 1px solid black; padding: 2px;">432032ok610.pdf</div>	(attached descriptive document)	<input checked="" type="checkbox"/>	<input 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> <div style="border: 1px solid black; padding: 2px;">432032ok1010.pdf</div>	(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 type="checkbox"/>	<input checked="" type="checkbox"/>
<1200> Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

<2000> Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers	(check to indicate certification)	<input 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 checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<3005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

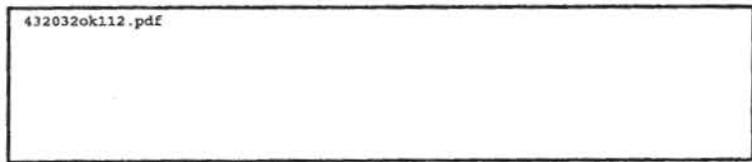
(100) Service Quality Improvement Reporting Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010> Study Area Code	432032
<015> Study Area Name	VALLIANT TEL CO
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Tommy Dorries
<035> Contact Telephone Number - Number of person identified in data line <030>	5809334400 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	tdorries@valliant.net

<110> Has your company received its ETC certification from the FCC?	(yes / no) <input type="radio"/> <input checked="" type="radio"/>
If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?	(yes / no) <input type="radio"/> <input type="radio"/>

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

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.



Name of Attached Document

Please check these boxes below to confirm that the attached 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	<input type="checkbox"/>
<114> Report how much universal service (USF) support was received	<input type="checkbox"/>
<115> How (USF) was used to improve service quality	<input type="checkbox"/>
<116> How (USF) was used to improve service coverage	<input type="checkbox"/>
<117> How (USF) was used to improve service capacity	<input type="checkbox"/>
<118> Provide an explanation of network improvement targets not met in the prior calendar year.	<input type="checkbox"/>

(900) Tribal Lands Reporting Data Collection Form

<010> Study Area Code 432032
 <015> Study Area Name VALLIANT TEL CO
 <020> Program Year 2015
 <030> Contact Name - Person USAC should contact regarding this data Tommy Dorries
 <035> Contact Telephone Number - Number of person identified in data line <030> 5809334400 ext.
 <039> Contact Email Address - Email Address of person identified in data line <030> tdorries@valliant.net

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

Choctaw Nation of Oklahoma

<920> Tribal Government Engagement Obligation

432032ok920.pdf

Name of Attached Document

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

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

Select (Yes, No, NA)
NA

NA

(1100) Non-terrestrial Backhaul Reporting		Cellular 433
Data Collection Form		OWA Center No. 3340483/000's (Area 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100)
		July 2015

<010>	Study Area Code	432032
<015>	Study Area Name	VALLIANT TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Tommy Dorries
<035>	Contact Telephone Number - Number of person identified in data line <030>	5809334400 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tdorries@valliant.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 of Lifeline Customers
Lifeline
Data collection: 2010

ETC Form 422
 OMB Control No. 3045-0048/OMB Control No. 3045-0049
 July 2009

<010>	Study Area Code	432032
<015>	Study Area Name	VALLIANT TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Tommy Dorries
<035>	Contact Telephone Number - Number of person identified in data line <030>	5809334400 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tdorries@valliant.net

432032ok1210.pdf

Name of Attached Document

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

<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.

(2000) Price Cap Carrier - Additional Reporting
 Data Collection Form
 Including Rate of Return Carriers Offered with All-Access Local Exchange Carriers

<010>	Study Area Code	432032
<015>	Study Area Name	VALLIANT TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Tommy Dorries
<035>	Contact Telephone Number - Number of person identified in data line <030>	5809334400 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tdorries@valliant.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) Title of Attachment - A 30001 - 10/10/2010	Form 487
Date of Attachment	OMB Control No. 3333-0047 Rev. 7/27/10
	July 2013

<010> Study Area Code	432032
<015> Study Area Name	VALLIANT TEL CO
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Tommy Dorrie
<035> Contact Telephone Number - Number of person identified in data line <030>	5809334400 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	tdorrie@valliant.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

432032ok3017.pdf

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

Name of Attached Document Listing Required Information



<010>	Study Area Code	432032
<015>	Study Area Name	VALLIANT TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Tommy Dorries
<035>	Contact Telephone Number - Number of person identified in data line <030>	5809334400 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tdorries@valliant.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:
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	432032
<015> Study Area Name	VALLIANT TEL CO
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Tommy Dorries
<035> Contact Telephone Number - Number of person identified in data line <030>	5809334400 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	tdorries@valliant.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>Shirley Prince</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:	Shirley Prince
Name of Reporting Carrier:	VALLIANT TEL CO
Signature of Authorized Officer:	CERTIFIED ONLINE Date: 06/30/2014
Printed name of Authorized Officer:	Shirley Prince
Title or position of Authorized Officer:	Secretary
Telephone number of Authorized Officer:	5809334400 ext.
Study Area Code of Reporting Carrier:	432032 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:	VALLIANT TEL CO
Name of Authorized Agent or Employee of Agent:	Deb Morgan
Signature of Authorized Agent or Employee of Agent:	CERTIFIED ONLINE Date: 06/30/2014
Printed name of Authorized Agent or Employee of Agent:	Deb Morgan
Title or position of Authorized Agent or Employee of Agent:	Manager Business Compliance
Telephone number of Authorized Agent or Employee of Agent:	5126527705 ext.
Study Area Code of Reporting Carrier:	432032 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

Following is the initial five-year service quality improvement plan for Valliant Telephone Company, Inc. ("Valliant" or "the Company") pursuant to 47 C.F.R. § 54.202(a)(1)(ii) that requires an eligible telecommunications carrier (ETC) to describe proposed improvements or upgrades to the ETC's network throughout its service area. The *USF/ICC Transformation Order* establishes a public interest obligation for rate-of-return ETCs to provide broadband service at speeds of at least 4 Mbps downstream and 1 Mbps upstream (4:1) "upon reasonable request." A service quality improvement plan cannot project where in the service area reasonable requests will be made. However, the proposed network expenditures in this plan ensure the continuation of high-quality voice and broadband services within the Company's service territory.

Although this plan is a good faith effort by the Company, it is subject to change, given the uncertainty faced by ETCs regarding whether capital investments will be recoverable over the five year planning horizon. Factors that may affect the capital improvements plan include erosion of the customer base due to competition, alternative technologies, economic conditions in the service area, and unpredictable changes in the universal service support amounts an ETC receives.

Valliant owns and operates three exchanges serving subscribers in the southeastern Oklahoma. The service area includes portions of Chocktaw, McCurtain, and Pushmataha counties. The Company's service area covers approximately 222 square miles.

Baseline Network Description



Table 1 - Current Broadband Capabilities

Exchange Name	Total Square Miles	Total Existing Access Lines	Estimated Total Population Served	Broadband Capable Lines	Estimated Broadband Capable Population	% Broadband Capable
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

2014 - 2019 Service Quality Improvement Plan

Table 2 provides Valliant's intended service quality improvements and associated capital expenditures for 2014 - 2019, by exchange, along with estimates of the population that will be served by the improvements.

Table 2 - Service Quality Improvement Plan

Exchange	Description of Improvement	2014	2015	2016	2017	2018	2019	Estimated Population Served by Improvements
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Narrative Description: 2014 - 2019

[REDACTED]

[REDACTED]

[REDACTED]

LINE 510 - SERVICE QUALITY STANDARDS AND CONSUMER PROTECTION RULES COMPLIANCE

Valliant Telephone Company complies with applicable service quality standards and consumer protection rules as required by the state regulatory commission and the Federal Communications Commission.

The rates, terms, and conditions under which the Company operates are outlined in its Local Exchange Tariff, which is approved by the state commission. The Company's tariff contains provisions regarding its customer service and protection practices, including resolving disputes with the Company, applying for service, the classification of business and residential rates, deposits, billing and payment for service, refusal, disconnection and cancellation of service. The tariff is available for customer review in the Business Office, as requested. Rates and terms of service are disclosed to customers upon application for service both verbally and in writing as part of a packet of information for new customers. Rates, applications and certain terms of service are also available on the Company's website.

Service quality standards are established by the state commission and the Company consistently meets or exceeds the standards and provides reports to the state commission, in accordance with the state commission's rules.

The protection of customers' privacy and information is of utmost importance and 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 at the FCC annually. Attached is a copy of the 2012 CPNI Certification and Accompanying Statement.

LINE 610 - ABILITY TO FUNCTION IN EMERGENCY SITUATIONS

Valliant Telephone Company certifies that it is able to function in emergency situations as set forth in the Code of Federal Regulations, Title 47, Part 54, Subpart C, §54.202(a)(2)¹. The Company has a reasonable amount of back-up power to ensure functionality without an external power source. Standby power generators are supplied at the central office, remote switch sites, and repeater sites to ensure functionality without an external power source until power is restored. The network is capable of managing traffic spikes resulting from emergency situations.

The company is able to reroute traffic around damaged facilities. Although the Company's ability to reroute traffic around damaged facilities is not absolute and may be limited in certain circumstances, there is a restoration plan in place for expeditious recovery of service, including splicing of damaged facilities when warranted.

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 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."

LINE 920 – TRIBAL GOVERNMENT ENGAGEMENT OBLIGATION

Valliant Telephone Company (Valliant or the Company) provides service within the territory of the Choctaw Nation of Oklahoma.¹ Valliant has contacted the Tribe to determine if other services may be required other than the residential telecommunications services it offers within the Choctaw Nation area, but the Tribe has never responded to discuss any special interests or services that may be required.

During the reporting period of 2013, the Company has not been contacted by any representative of the Tribal government about the Company's service offerings.

¹ FCC Public Notice, DA12-1165, released July 19, 2012, footnote 2, states, "In the context of the *USF/ICC Transformation Order*, "Tribal lands" is defined as "any federally recognized Indian tribe reservation, pueblo or colony, including former reservations in Oklahoma..."

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").¹

In the exchanges served by Seneca Telephone Company ("the Company"), the highest single-line residential local rate, including any mandatory extended area service charge, is \$14.00. When the federal SLC (\$6.50) and the state universal service fee (\$.34) are included, the rate becomes \$20.84. Therefore, the Company's pricing of fixed voice services is less than the reasonable comparability benchmark of \$46.96.

¹ *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

Valliant Telephone Company (the Company) offers Lifeline subscribers federal and state Lifeline discounts to a stand-alone residential local exchange access line rate of \$14.00 and Subscriber Line Charge of \$6.50. The local exchange access line rate includes an unlimited amount of local calling minutes. Additional charges for toll calls associated with the stand-alone residential access line are billed at the rates of the long distance carrier chosen by the subscriber. There are no additional voice telephony plans offered although a Lifeline customer may subscribe to other services such as custom calling features at the standard rates offered to all customers. Attached are pages from the Company's Local Exchange Tariff describing terms and conditions that explain the Lifeline Credits and Lifeline Credits on Tribal Lands for residential customers.

LOCAL EXCHANGE SERVICE

IV. LIFELINE SERVICE

A. Applicability

1. Lifeline Service is a telecommunications service assistance program designed to provide eligible residential customers with a credit to be applied to the price of basic local exchange service.
2. Eligible customers will receive a credit as set forth in Section IV. Lifeline Credits below, to be applied to their basic local exchange access service.
3. Customers shall not receive more than one Lifeline credit regardless of the number of residential access lines or locations the customer receives service within the State of Oklahoma.
4. All charges, either recurring or nonrecurring, for any service or feature other than Lifeline Service shall be billed at the tariffed rate.
5. Lifeline Service shall not be available on a retroactive basis.

B. Designated Services Available to Lifeline Customers (1)

The following services shall be offered to eligible Lifeline customers:

1. Single Party Service
2. Local Usage
3. Touch Tone Services
4. Voice Grade Access to the Public Switched Network
5. Access to Emergency Services
6. Access to Operator Services
7. Access to Interexchange Services
8. Access to Directory Assistance
9. Availability of Toll Restriction at No Charge (2)

C. Eligibility Requirements

1. Customers or applicants seeking a Lifeline service credit must provide documentation to the Company establishing that the customer or applicant meets one or more of the following eligibility requirements prior to receiving the Lifeline service credit.

- (1) Lifeline service may not be disconnected for non-payment of toll charges.
(2) Eligible customers accepting toll restriction services shall not be required to pay a deposit.

LOCAL EXCHANGE SERVICE

IV. LIFELINE SERVICE

C. Eligibility Requirements (Continued)

- a. The applicant or customer must meet the requirements for eligibility for either Medicaid, Food Stamps, federal public housing, Low-Income Energy Assistance Program, or Supplemental Security Income. Additionally, persons who are eligible recipients of income assistance for Vocational Rehabilitation (including Aid to the Hearing Impaired) are also eligible for the Lifeline Service credit; or
 - b. Are eligible for or receive assistance or benefits, as certified by the State Department of Rehabilitation services, under programs providing vocational rehabilitation, including aid to the hearing impaired; or
 - c. Are eligible for or receive assistance or benefits, as certified by the Oklahoma Tax Commission, pursuant, pursuant to the Sales Tax Relief Act, section 5011 et seq. of Title 68 of the Oklahoma Statutes.
 - d. For federal income tax purposes, the applicant is not a dependant unless over sixty years of age.
2. The eligibility requirements listed above will be certified to by the applicant or the applicable state agency. The Company assumes no responsibility for the certification of customers or applicants eligibility.
 3. Upon receipt of the applicant's documentation establishing eligibility as stated above, the Company will begin providing the credit.
 4. Lifeline customers are required to provide documentation for the purpose of determining their continuing eligibility for the Lifeline credit, upon request of the Company, no less frequently than annually.
 5. The Lifeline service credit will be discontinued for customers who no longer meet the eligibility requirements for the Lifeline Service credit.

[Handwritten signature]
JAN 11 1998
OFFICE OF THE ATTORNEY GENERAL
STATE OF OKLAHOMA

LOCAL EXCHANGE SERVICE

IV. LIFELINE SERVICE

D. Lifeline Credits

	<u>Monthly Credit (1)</u>
1) federal subscriber line charge credit	(2)
2) initial federal credit to residential access line	\$1.75
3) initial state credit to residential access line	\$1.17
4) additional federal credit to residential access line (3)	\$0.58

- (1) Credit amount will not exceed the total of the subscriber line charge and the residential local exchange rate. In no instance will a subscriber's monthly local exchange rate be less than \$2.50 after application of the Lifeline credits.
- (2) Lifeline Service has been certified by the FCC, therefore, eligible Lifeline customers will receive the appropriate waiver of the Subscriber Line Charge (SLC) as specified by the FCC.
- (3) Half of the amount specified on line 3, not to exceed \$1.75.

ADDITIONAL
DIRECT
PUBLIC UTILITIES

LOCAL EXCHANGE SERVICE

IV. LIFELINE SERVICE

E. Eligibility Requirements for Lifeline Service On Tribal Lands

AT

1. The applicant or customer seeking to obtain Lifeline Service on Tribal Lands (see definition in 2.a. below) must demonstrate their current participation in at least one of the following assistance programs. The Applicant or customer shall complete and sign, under penalty of perjury, an authorization and self certification form provided by the Company. The Applicant or customer must check all of the following that apply.

- 2. Supplemental Nutrition Assistance Program ("SNAP" *aka* Food Stamps)
- b. Temporary Assistance for Needy Families (TANF)
- c. Supplemental Security Income (SSI)
- d. Medical Assistance (Medicaid/SoonerCare)
- e. Vocational Rehabilitation (Including aid to the hearing impaired)
- f. Oklahoma Sales Tax Relief
- g. Federal Public Housing Assistance
- h. Low Income Home Energy Assistance Program
- i. Food Distribution Program on Indian Reservations ("FDPIR")
- j. 135% of the Federal Poverty Guidelines
- k. Bureau of Indian Affairs general assistance; (1)
- l. Temporary Assistance for Needy Families (TANF) tribally-administered block grant programs; (2)
- m. Head Start Programs (only applicant or customer who satisfy the income qualifying eligibility provision); or
- n. National School Lunch Program (only applicant or customer who satisfy the income standard of the program for free meals).

AT

AT
AT

- 2. The applicant or customer must also certify:
 - a. Residence on Tribal Lands as described in Title 25, Code of Federal Regulations, Section 20.1, paragraph (v).
 - b. Agreement to notify Company if applicant or customer no longer participates in the program or programs described in paragraph 1. above, for which the Applicant or Customer certified their participation in.
 - c. The applicant must not be a dependent for Federal Income Tax purposes, unless the applicant is over the age of 60.

3. Upon receipt of the completed self certification, Company will begin providing the credit set forth in F. below. Lifeline credits will not be implemented or continued unless telephone service arrangements are and remain, within the Lifeline Service criteria specified above.

(1) Applicant must "have sufficient resources to meet the basic and special needs defined by the Department of Human Services," 25 C.F.R. § 20.1.
(2) 42 U.S.C. § 612 and 45 C.F.R. § 206.

IV. LIFELINE SERVICE LOCAL EXCHANGE SERVICE

E. Eligibility Requirements for Lifeline Service On Tribal Lands (Continued) AT

4. The Lifeline credits will be discontinued upon receipt by the Company of notice by the Customer that they no longer meet the eligibility requirements for the Lifeline credits.
5. The Lifeline credits will be automatically discontinued unless the customer annually certifies they continue to meet the eligibility requirements for Lifeline credits. All such annual re-self certifications must be submitted to the Company within the time frames determined by the Company.
6. Lifeline customers will be converted to standard residential service rates once they no longer qualify for Lifeline Service. No service charge will apply for this change in service.

F. Lifeline Credits on Tribal Lands DT

Lifeline Service on Tribal Lands has been established by the Federal Communications Commission (FCC), therefore eligible Lifeline customers will receive the appropriate credits, depending on the programs the customer participates in, as specified by the FCC in its Twelfth Report and Order entered into in CC Docket No. 96-45 and as set forth below:

1. If a customer indicates eligibility to receive Lifeline credits as, Supplemental Nutrition Assistance Program ("SNAP" *aka* Food Stamps), Temporary Assistance for Needy Families (TANF), Supplemental Security Income (SSI), Medical Assistance, Vocational Rehabilitation (including aid to the hearing impaired), Food Distribution Program on Indian Reservations ("FDPIR") or Oklahoma Sales Tax Relief Act (68 O.S. §5011, et seq.), then the Customer should receive credits as follows: A-T

	<u>Monthly Credit⁽¹⁾</u>	
Federal Lifeline Credit:	\$9.25	CR
Oklahoma Universal Service Fund Credit:		
Additional Federal Credit to Residential Access Line	\$1.17	CR
necessary to reduce customer's bill to \$1.00	(see footnote (2) below)	

(1) Credit amount will not exceed the total of the subscriber line charge and the residential local exchange rate, less \$1.00 per month. The amount of the subscriber's monthly local exchange rate be less than \$1.00 after the application of the Lifeline Credit.
(2) Eligible customers will also receive an additional reduction of their applicable monthly credit rate for each household member 65 years of age or older as specified by the FCC in its Twelfth Report and Order entered in CC Docket No. 96-45.

LOCAL EXCHANGE SERVICE

IV. LIFELINE SERVICE

F. Lifeline Credits on Tribal Lands (Continued) DT

2. If a customer indicates his eligibility to receive Lifeline credits as only one or more of the following: Federal Public Housing Assistance, Low Income Home Energy Assistance Program, Bureau of Indian Affairs general assistance, Temporary Assistance for Needy Families (TANF) tribally administered block grant programs, Head Start Programs (only those meeting its income qualifying eligibility provision), 135% of the Federal Poverty Guidelines or National School Lunch Program (only Applicant or customer who satisfy the income standard of the program for free meals), then the Customer should receive credits as follows: AT

	Monthly Credit ⁽³⁾	
Federal Lifeline Credit:	\$9.25	CR
Additional Federal Credit to Residential Access Line necessary to reduce customer's bill to \$1.00	(see footnote (4) below)	

DT

(3) Credit amount will not exceed the total of the subscriber line charge and the residential local exchange rate less \$1.00. The amount will a subscriber's monthly local exchange rate be less than \$1.00 after the application of the Lifeline Credit.

(4) Eligible customers will also receive an additional reduction off the applicable monthly tariff rate for their local exchange service, not to exceed \$25.00 as specified by the FCC in its Twelfth Report and Order entered in CC Docket No. 96-45.

According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0572-0031. The time required to complete this information collection is estimated to average 4 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.

USDA-RUS OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS	This data will be used by RUS to review your financial situation. Your response is required by 7 U.S.C. 901 et seq. and, subject to federal laws and regulations regarding confidential information, will be treated as confidential. BORROWER NAME Valliant Telephone Company (Prepared with Audited Data)	
INSTRUCTIONS-Submit report to RUS within 30 days after close of the period. For detailed instructions, see RUS Bulletin 1744-2. Report in whole dollars only.	PERIOD ENDING December, 2013	BORROWER DESIGNATION OK0554
CERTIFICATION We hereby certify that the entries in this report are in accordance with the accounts and other records of the system and reflect the status of the system to the best of our knowledge and belief. ALL INSURANCE REQUIRED BY 7 CFR PART 1788, CHAPTER XVII, RUS, WAS IN FORCE DURING THE REPORTING PERIOD AND RENEWALS HAVE BEEN OBTAINED FOR ALL POLICIES. DURING THE PERIOD COVERED BY THIS REPORT PURSUANT TO PART 1788 OF 7CFR CHAPTER XVII (Check one of the following)		
<input checked="" type="checkbox"/> All of the obligations under the RUS loan documents have been fulfilled in all material respects.		
<input type="checkbox"/> There has been a default in the fulfillment of the obligations under the RUS loan documents. Said default(s) is/are specifically described in the Telecom Operating Report		
robert prince	6/24/2014	
DATE		

PART A. BALANCE SHEET					
ASSETS	BALANCE PRIOR YEAR	BALANCE END OF PERIOD	LIABILITIES AND STOCKHOLDERS' EQUITY	BALANCE PRIOR YEAR	BALANCE END OF PERIOD
CURRENT ASSETS			CURRENT LIABILITIES		
1. Cash and Equivalents			25. Accounts Payable		
2. Cash-RUS Construction Fund			26. Notes Payable		
3. Affiliates:			27. Advance Billings and Payments		
a. Telecom, Accounts Receivable			28. Customer Deposits		
b. Other Accounts Receivable			29. Current Mat. L/T Debt		
c. Notes Receivable			30. Current Mat. L/T Debt-Rur. Dev.		
4. Non-Affiliates:			31. Current Mat.-Capital Leases		
a. Telecom, Accounts Receivable			32. Income Taxes Accrued		
b. Other Accounts Receivable			33. Other Taxes Accrued		
c. Notes Receivable			34. Other Current Liabilities		
5. Interest and Dividends Receivable			35. Total Current Liabilities (25 thru 34)		
6. Material-Regulated			LONG-TERM DEBT		
7. Material-Nonregulated			36. Funded Debt-RUS Notes		
8. Prepayments			37. Funded Debt-RTB Notes		
9. Other Current Assets			38. Funded Debt-FFB Notes		
10. Total Current Assets (1 Thru 9)			39. Funded Debt-Other		
NONCURRENT ASSETS			40. Funded Debt-Rural Develop. Loan		
11. Investment in Affiliated Companies			41. Premium (Discount) on L/T Debt		
a. Rural Development			42. Reacquired Debt		
b. Nonrural Development			43. Obligations Under Capital Lease		
12. Other Investments			44. Adv. From Affiliated Companies		
a. Rural Development			45. Other Long-Term Debt		
b. Nonrural Development			46. Total Long-Term Debt (36 thru 45)		
13. Nonregulated Investments			OTHER LIAB. & DEF. CREDITS		
14. Other Noncurrent Assets			47. Other Long-Term Liabilities		
15. Deferred Charges			48. Other Deferred Credits		
16. Jurisdictional Differences			49. Other Jurisdictional Differences		
17. Total Noncurrent Assets (11 thru 16)			50. Total Other Liabilities and Deferred Credits (47 thru 49)		
PLANT, PROPERTY, AND EQUIPMENT			EQUITY		
18. Telecom, Plant-in-Service			51. Cap. Stock Outstand. & Subscribed		
19. Property Held for Future Use			52. Additional Paid-in-Capital		
20. Plant Under Construction			53. Treasury Stock		
21. Plant Adj., Nonop. Plant & Goodwill			54. Membership and Cap. Certificates		
22. Less Accumulated Depreciation			55. Other Capital		
23. Net Plant (18 thru 21 less 22)			56. Patronage Capital Credits		
24. TOTAL ASSETS (10+17+23)			57. Retained Earnings or Margins		
			58. Total Equity (51 thru 57)		
			59. TOTAL LIABILITIES AND EQUITY (35+46+50+58)		

Total Equity = 48.74% % of Total Assets

USDA-RUS OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS	BORROWER DESIGNATION OK0554
INSTRUCTIONS- See RUS Bulletin 1744-2	PERIOD ENDING December, 2013

PART B. STATEMENTS OF INCOME AND RETAINED EARNINGS OR MARGINS

ITEM	PRIOR YEAR	THIS YEAR
1. Local Network Services Revenues		
2. Network Access Services Revenues		
3. Long Distance Network Services Revenues		
4. Carrier Billing and Collection Revenues		
5. Miscellaneous Revenues		
6. Uncollectible Revenues		
7. Net Operating Revenues (1 thru 5 less 6)		
8. Plant Specific Operations Expense		
9. Plant Nonspecific Operations Expense (Excluding Depreciation & Amortization)		
10. Depreciation Expense		
11. Amortization Expense		
12. Customer Operations Expense		
13. Corporate Operations Expense		
14. Total Operating Expenses (8 thru 13)		
15. Operating Income or Margins (7 less 14)		
16. Other Operating Income and Expenses		
17. State and Local Taxes		
18. Federal Income Taxes		
19. Other Taxes		
20. Total Operating Taxes (17+18+19)		
21. Net Operating Income or Margins (15+16-20)		
22. Interest on Funded Debt		
23. Interest Expense - Capital Leases		
24. Other Interest Expense		
25. Allowance for Funds Used During Construction		
26. Total Fixed Charges (22+23+24-25)		
27. Nonoperating Net Income		
28. Extraordinary Items		
29. Jurisdictional Differences		
30. Nonregulated Net Income		
31. Total Net Income or Margins (21+27+28+29+30-26)		
32. Total Taxes Based on Income		
33. Retained Earnings or Margins Beginning-of-Year		
34. Miscellaneous Credits Year-to-Date		
35. Dividends Declared (Common)		
36. Dividends Declared (Preferred)		
37. Other Debits Year-to-Date		
38. Transfers to Patronage Capital		
39. Retained Earnings or Margins End-of-Period [(31+33+34) - (35+36+37+38)]		
40. Patronage Capital Beginning-of-Year		
41. Transfers to Patronage Capital		
42. Patronage Capital Credits Retired		
43. Patronage Capital End-of-Year (40+41-42)		
44. Annual Debt Service Payments		
45. Cash Ratio [(14+20-10-11) / 7]		
46. Operating Accrual Ratio [(14+20+26) / 7]		
47. TIER [(31+26) / 26]		
48. DSCR [(31+26+10+11) / 44]		

USDA-RUS

**OPERATING REPORT FOR
TELECOMMUNICATIONS BORROWERS**

INSTRUCTIONS - See RUS Bulletin 1744-2

BORROWER DESIGNATION

OK0554

PERIOD ENDED

December, 2013

Part C. SUBSCRIBER (ACCESS LINE), ROUTE MILE, & HIGH SPEED DATA INFORMATION

EXCHANGE	1. RATES		2. SUBSCRIBERS (ACCESS LINES)			3. ROUTE MILES	
	B-1 (a)	R-1 (b)	BUSINESS (a)	RESIDENTIAL (b)	TOTAL (c)	TOTAL (including fiber) (a)	FIBER (b)
Valliant							
Millerton							
Rufe							
MobileWireless							
Route Mileage Outside Exchange Area							
Total							
No. Exchanges							

USDA-RUS

**OPERATING REPORT FOR
TELECOMMUNICATIONS BORROWERS**

BORROWER DESIGNATION

OK0554

PERIOD ENDING
December, 2013

INSTRUCTIONS- See RUS Bulletin 1744-2

PART D. SYSTEM DATA

1. No. Plant Employees	2. No. Other Employees	3. Square Miles Served	4. Access Lines per Square Mile	5. Subscribers per Route Mile
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PART E. TOLL DATA

1. Study Area ID Code(s) a. _____ b. _____ c. _____ d. _____ e. _____ f. _____ g. _____ h. _____ i. _____ j. _____	2. Types of Toll Settlements (Check one)		
	Interstate:	<input type="checkbox"/> Average Schedule	<input checked="" type="checkbox"/> Cost Basis
	Intrastate:	<input type="checkbox"/> Average Schedule	<input checked="" type="checkbox"/> Cost Basis

PART F. FUNDS INVESTED IN PLANT DURING YEAR

1. RUS, RTB, & FFB Loan Funds Expended	
2. Other Long-Term Loan Funds Expended	
3. Funds Expended Under RUS Interim Approval	
4. Other Short-Term Loan Funds Expended	
5. General Funds Expended (Other than Interim)	
6. Salvaged Materials	
7. Contribution in Aid to Construction	
8. Gross Additions to Telecom. Plant (1 thru 7)	

PART G. INVESTMENTS IN AFFILIATED COMPANIES

INVESTMENTS (a)	CURRENT YEAR DATA		CUMULATIVE DATA		
	Investment This Year (b)	Income/Loss This Year (c)	Cumulative Investment To Date (d)	Cumulative Income/Loss To Date (e)	Current Balance (f)
1. Investment in Affiliated Companies - Rural Development					0
2. Investment in Affiliated Companies - Nonrural Development					

USDA-RUS

**OPERATING REPORT FOR
TELECOMMUNICATIONS BORROWERS**

BORROWER DESIGNATION

OK0554

PERIOD ENDING

December, 2013

PART H. CURRENT DEPRECIATION RATES

Are corporation's depreciation rates approved by the regulatory authority with jurisdiction over the provision of telephone services? (Check one)

YES NO

EQUIPMENT CATEGORY

DEPRECIATION RATE

- 1. Land and support assets - Motor Vehicles
- 2. Land and support assets - Aircraft
- 3. Land and support assets - Special purpose vehicles
- 4. Land and support assets - Garage and other work equipment
- 5. Land and support assets - Buildings
- 6. Land and support assets - Furniture and Office equipment
- 7. Land and support assets - General purpose computers
- 8. Central Office Switching - Digital
- 9. Central Office Switching - Analog & Electro-mechanical
- 10. Central Office Switching - Operator Systems
- 11. Central Office Transmission - Radio Systems
- 12. Central Office Transmission - Circuit equipment
- 13. Information origination/termination - Station apparatus
- 14. Information origination/termination - Customer premises wiring
- 15. Information origination/termination - Large private branch exchanges
- 16. Information origination/termination - Public telephone terminal equipment
- 17. Information origination/termination - Other terminal equipment
- 18. Cable and wire facilities - Poles
- 19. Cable and wire facilities - Aerial cable - Metal
- 20. Cable and wire facilities - Aerial cable - Fiber
- 21. Cable and wire facilities - Underground cable - Metal
- 22. Cable and wire facilities - Underground cable - Fiber
- 23. Cable and wire facilities - Buried cable - Metal
- 24. Cable and wire facilities - Buried cable - Fiber
- 25. Cable and wire facilities - Conduit systems
- 26. Cable and wire facilities - Other

USDA-RUS
**OPERATING REPORT FOR
 TELECOMMUNICATIONS BORROWERS**

BORROWER DESIGNATION
 OK0554

PERIOD ENDED
 December, 2013

INSTRUCTIONS – See help in the online application.

PART I – STATEMENT OF CASH FLOWS

1. **Beginning Cash (Cash and Equivalents plus RUS Construction Fund)**

CASH FLOWS FROM OPERATING ACTIVITIES

2. **Net Income**

Adjustments to Reconcile Net Income to Net Cash Provided by Operating Activities

3. Add: Depreciation

4. Add: Amortization

5. Other (Explain)

Changes in Operating Assets and Liabilities

6. Decrease/(Increase) in Accounts Receivable

7. Decrease/(Increase) in Materials and Inventory

8. Decrease/(Increase) in Prepayments and Deferred Charges

9. Decrease/(Increase) in Other Current Assets

10. Increase/(Decrease) in Accounts Payable

11. Increase/(Decrease) in Advance Billings & Payments

12. Increase/(Decrease) in Other Current Liabilities

13. **Net Cash Provided/(Used) by Operations**

CASH FLOWS FROM FINANCING ACTIVITIES

14. Decrease/(Increase) in Notes Receivable

15. Increase/(Decrease) in Notes Payable

16. Increase/(Decrease) in Customer Deposits

17. Net Increase/(Decrease) in Long Term Debt (Including Current Maturities)

18. Increase/(Decrease) in Other Liabilities & Deferred Credits

19. Increase/(Decrease) in Capital Stock, Paid-in Capital, Membership and Capital Certificates & Other Capital

20. Less: Payment of Dividends

21. Less: Patronage Capital Credits Retired

22. Other (Explain)

23. **Net Cash Provided/(Used) by Financing Activities**

CASH FLOWS FROM INVESTING ACTIVITIES

24. Net Capital Expenditures (Property, Plant & Equipment)

25. Other Long-Term Investments

26. Other Noncurrent Assets & Jurisdictional Differences

27. Other (Explain)

Amortization included in change in other long-term investments

28. **Net Cash Provided/(Used) by Investing Activities**

29. **Net Increase/(Decrease) in Cash**

30. **Ending Cash**