



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

REDACTED - FOR PUBLIC INSPECTION

VIA OVERNIGHT DELIVERY

June 26, 2014

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

RECEIVED & INSPECTED
 JUN 30 2014
 FCC Mail Room

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, Five Area Telephone Cooperative, Inc. (the Cooperative), Study Area Code 442071, 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 Cooperative, 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 Five Area Telephone Cooperative, Inc. maintains as confidential and does not normally make available to the public. Release of this information would have a substantial negative impact on the Cooperative.

No. of Copies rec'd 071
 List ABCDE

Ms. Marlene H. Dortch
June 26, 2014
Page 2 of 5

Five-Year Service Quality Improvement Plan

Pursuant to section 0.459 of the Commission's rules and Exemption 4 of FOIA, Five Area Telephone Cooperative, Inc. 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 Cooperative keeps confidential. Public availability of this information would have a substantial negative impact on the Cooperative.

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 Cooperative'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 Cooperative'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 Cooperative does not make publicly available.

Ms. Marlene H. Dortch
June 26, 2014
Page 3 of 5

- (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.

- (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 Cooperative’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 Cooperative.

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

The Cooperative 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 Cooperative requests that the extracted information be withheld from public inspection indefinitely. Although the information reflects the Cooperative’s service improvement plans for a five year period, it would provide a very useful baseline for competitors for several years beyond that period.

Ms. Marlene H. Dortch
June 26, 2014
Page 4 of 5

- (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 Cooperative's financial condition and operations pursuant to 47 C.F.R. §54.313(f)(2). Five Area Telephone Cooperative, Inc. 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).

Five Area Telephone Cooperative, Inc. 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.

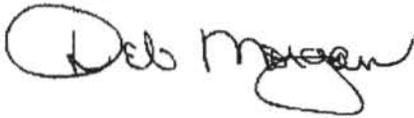
¹ *Connect America Fund et al.*, WC Docket No. 10-90 *et al.*, *Protective Order*, DA 12-1857 (rel. Nov. 16, 2012).

Ms. Marlene H. Dortch
June 26, 2014
Page 5 of 5

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

Please contact me if you have any questions.

Sincerely,



Deb Morgan
Authorized Representative for
Five Area Telephone Cooperative, Inc.

DM/pjf

Enclosures

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

Mr. Sandy Vandevender, Five Area Telephone Cooperative, Inc.

<010> Study Area Code	442071
<015> Study Area Name	FIVE AREA TEL. COOP. INC
<020> Program Year	2015
<030> Contact Name: Person USAC should contact with questions about this data	Patti Kent
<035> Contact Telephone Number: Number of the person identified in data line <030>	8062725533 ext.
<039> Contact Email Address: Email of the person identified in data line <030>	pattik@fivearea.com

Received & Inspected
 JUN 30 2014
 FCC Mail Room

REPORTING FOR PRICE CAP 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 type="checkbox"/>	<input checked="" type="checkbox"/>
<310> Detail on Attempts (voice)	<div style="border: 1px solid black; height: 40px; width: 100%;"></div> (attach descriptive document)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<320> Unfulfilled Service Requests (broadband)	0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<330> Detail on Attempts (broadband)	<div style="border: 1px solid black; height: 40px; width: 100%;"></div> (attach descriptive document)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<400> Number of Complaints per 1,000 customers (voice)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<410> Fixed	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420> Mobile		<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;">442071tx510.pdf</div>	(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> <div style="border: 1px solid black; padding: 2px;">442071tx610.pdf</div>	(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 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;">442071tx1010.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 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 checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<3005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

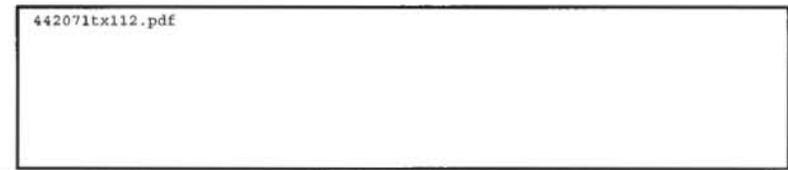
(100) Service Quality Improvement Reporting Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010> Study Area Code	442071
<015> Study Area Name	FIVE AREA TEL. COOP. INC
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Patti Kent
<035> Contact Telephone Number - Number of person identified in data line <030>	8062725533 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	pattik@fivearea.com

<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 pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.



Name of Attached Document

Please check these boxes below to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

- <113> Maps detailing progress towards meeting plan targets
- <114> Report how much universal service (USF) support was received
- <115> How (USF) was used to improve service quality
- <116> How (USF) was used to improve service coverage
- <117> How (USF) was used to improve service capacity
- <118> Provide an explanation of network improvement targets not met in the prior calendar year.



<010>	Study Area Code	442071
<015>	Study Area Name	FIVE AREA TEL. COOP. INC
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Patti Kent
<035>	Contact Telephone Number - Number of person identified in data line <030>	8062725533 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	pattik@fivearea.com

<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)



<010>	Study Area Code	442071
<015>	Study Area Name	FIVE AREA TEL. COOP. INC
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Patti Kent
<035>	Contact Telephone Number - Number of person identified in data line <030>	8062725533 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	pattik@fivearea.com

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

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

1209 Terms and Conditions of Lifeline Customer
 Lifeline
 Data Collection Form
 FCC Form 485
 ETC Control No. 00000000000000000000000000000000
 July 2013

<010>	Study Area Code	442071
<015>	Study Area Name	FIVE AREA TEL. COOP. INC
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Patti Kent
<035>	Contact Telephone Number - Number of person identified in data line <030>	8062725533 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	pattik@fivearea.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans



Name of Attached Document

<1220> Link to Public Website

HTTP

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

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



<010> Study Area Code	442071
<015> Study Area Name	FIVE AREA TEL. COOP. INC
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Patti Kent
<035> Contact Telephone Number - Number of person identified in data line <030>	8062725533 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	pattik@fivearea.com

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

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

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) Yes No

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

442071tx3026.pdf

Name of Attached Document Listing Required Information



<010> Study Area Code	442071
<015> Study Area Name	FIVE AREA TEL. COOP. INC
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Patti Kent
<035> Contact Telephone Number - Number of person identified in data line <030>	8062725533 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	pattik@fivearea.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

<010> Study Area Code	442071
<015> Study Area Name	FIVE AREA TEL. COOP. INC
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Patti Kent
<035> Contact Telephone Number - Number of person identified in data line <030>	8062725533 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	pattik@fivearea.com

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

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	
Name of Reporting Carrier: FIVE AREA TEL. COOP. INC	
Signature of Authorized Officer: CERTIFIED ONLINE	Date:
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier: 442071	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: FIVE AREA TEL. COOP. INC	
Name of Authorized Agent or Employee of Agent: Deb Morgan	
Signature of Authorized Agent or Employee of Agent: CERTIFIED ONLINE	Date:
Printed name of Authorized Agent or Employee of Agent: Deb Morgan	
Title or position of Authorized Agent or Employee of Agent: Manager of Business Compliance	
Telephone number of Authorized Agent or Employee of Agent: 5126527705 ext.	
Study Area Code of Reporting Carrier: 442071	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 PLANS

Attached are the five-year and a ten-year service quality improvement plans for Five Area Telephone Cooperative, Inc. and West Plains Telecommunications, Inc. ("Five Area " or "West Plains") 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. Tables 1 and 2 attached are the combined 5-Year and 10-Year Broadband Plans for Five Area Telephone Cooperative, Inc. and West Plains Telecommunications, Inc. as both ETCs serve subscribers in the same Study Area Code. Five Area and West Plains service areas include portions of Bailey, Castro, Cochran, Hockley, Lamb, Parmer and Sudan counties. Five Area owns and operates 6 exchanges and West Plains owns and operates 5 exchanges in West Texas.

Table 1, 5 Year Projection Plan will continue to add more infrastructure facilities throughout the service area in the exchanges Earth, Olton and Lariat as outlined on the Five Year Projection Plan. Table 2, Ten Year Projection Plan shows the current and future construction plans to place cable and fiber for Broadband service in rural communities that Five Area and West Plains serves in the exchanges of Earth, Olton, Springlake, Lariat, Bula, Maple, and Lehman.

Tables 1 and 2 show by exchange the construction timelines and the cost of investments for improving Broadband services to reach communities located in the exchanges that Five Area and West Plain serve. These service quality improvements are expected to provide subscribers that do not already receive 4:1 broadband-capable service the ability to receive speeds of 4:1 or greater, while also improving speeds for existing broadband-capable subscribers.

FIVE YEAR PROJECTION

2014 EARTH

DROP CONSTRUCTION
 MAINLINE CONSTRUCTION
 ELECTRONICS
 TOTAL

Totals



30-Jun

UNDERCONSTR
 INSERVICE
 TOTAL
 RETIREMENT



31-Dec

UNDERCONSTR
 INSERVICE
 TOTAL
 RETIREMENT
 TOTAL RETIREMENT



2015 EARTH

DROP CONSTRUCTION
 MAINLINE CONSTRUCTION
 ELECTRONICS
 TOTAL

30-Jun

UNDERCONSTR
 INSERVICE
 TOTAL
 RETIREMENT

31-Dec

UNDERCONSTR
 INSERVICE
 TOTAL
 RETIREMENT
 TOTAL RETIREMENT

2016 EARTH

DROP CONSTRUCTION
 MAINLINE CONSTRUCTION
 ELECTRONICS
 TOTAL

30-Jun

UNDERCONSTR
 INSERVICE
 TOTAL
 RETIREMENT

31-Dec

UNDERCONSTR
 INSERVICE
 TOTAL
 RETIREMENT
 TOTAL RETIREMENT

2017 OLTON

DROP CONSTRUCTION
 MAINLINE CONSTRUCTION
 ELECTRONICS
 TOTAL

30-Jun

UNDERCONSTR
 INSERVICE
 TOTAL
 RETIREMENT

31-Dec

UNDERCONSTR
 INSERVICE
 TOTAL
 RETIREMENT
 TOTAL RETIREMENT

2018 LARIAT

MAINLINE CONSTRUCTION
ELECTRONICS
TOTAL



30-Jun
UNDERCONSTR
INSERVICE
TOTAL
RETIREMENT



31-Dec
UNDERCONSTR
INSERVICE
TOTAL
RETIREMENT
TOTAL RETIREMENT



FIVE YEAR TOTALS

DROP CONSTRUCTION TOTAL
MAINLINE CONSTRUCTION TOTAL
ELECTRONICS TOTAL
OVERALL TOTAL
RETIREMENT TOTAL

TEN YEAR PROJECTION

		TOTALS		
WPT-2014 EARTH		FTTP	30-Jun	31-Dec
DROP CONSTRUCTION			UNDERCONSTRUCTION	UNDERCONSTRUCTION
MAINLINE CONSTRUCTION			INSERVICE	INSERVICE
ELECTRONICS			TOTAL	TOTAL
TOTAL			RETIREMENT	RETIREMENT
			TOTAL RETIREMENT	TOTAL RETIREMENT
WPT-2015 EARTH		FTTP	30-Jun	31-Dec
DROP CONSTRUCTION			UNDERCONSTRUCTION	UNDERCONSTRUCTION
MAINLINE CONSTRUCTION			INSERVICE	INSERVICE
ELECTRONICS			TOTAL	TOTAL
TOTAL			RETIREMENT	RETIREMENT
			TOTAL RETIREMENT	TOTAL RETIREMENT
WPT-2016 EARTH		FTTP	30-Jun	31-Dec
DROP CONSTRUCTION			UNDERCONSTRUCTION	UNDERCONSTRUCTION
MAINLINE CONSTRUCTION			INSERVICE	INSERVICE
ELECTRONICS			TOTAL	TOTAL
TOTAL			RETIREMENT	RETIREMENT
			TOTAL RETIREMENT	TOTAL RETIREMENT
WPT-2017 OLTON		FTT NODE	30-Jun	31-Dec
DROP CONSTRUCTION			UNDERCONSTRUCTION	UNDERCONSTRUCTION
MAINLINE CONSTRUCTION			INSERVICE	INSERVICE
ELECTRONICS			TOTAL	TOTAL
TOTAL			RETIREMENT	RETIREMENT
			TOTAL RETIREMENT	TOTAL RETIREMENT
WPT-2018 SPRINGLKE		FTTP	30-Jun	31-Dec
MAINLINE CONSTRUCTION			UNDERCONSTRUCTION	UNDERCONSTRUCTION
ELECTRONICS			INSERVICE	INSERVICE
TOTAL			TOTAL	TOTAL
			RETIREMENT	RETIREMENT
			TOTAL RETIREMENT	TOTAL RETIREMENT
FATC-2019 LARIAT		FTT NODE	30-Jun	31-Dec
MAINLINE CONSTRUCTION			UNDERCONSTRUCTION	UNDERCONSTRUCTION
ELECTRONICS			INSERVICE	INSERVICE
TOTAL			TOTAL	TOTAL
			RETIREMENT	RETIREMENT
			TOTAL RETIREMENT	TOTAL RETIREMENT