

**STATEMENT  
of  
JASON TOLE  
ASSISTANT GENERAL MANAGER AND CHIEF FINANCIAL OFFICER  
SANTA ROSA TELEPHONE COOPERATIVE, INC. CLEC**

I am Jason Tole, Assistant General Manager and Chief Financial Officer of Santa Rosa Telephone Cooperative, Inc. CLEC (“Santa Rosa” or “the Company”). Santa Rosa is a rural competitive local exchange carrier serving 12 exchanges in north central Texas. I have direct knowledge of the factual statements made in numbers 1, 4, 5 and 6 below regarding Santa Rosa’s provision of service in the census blocks being challenged. I have indirect knowledge of the factual statements made in numbers 2 and 3. The information was provided to me by Si Clark, the Company’s Engineering and Mapping Supervisor.

1. Santa Rosa is a competitive eligible telecommunications carrier (CETC) in all of its price cap area exchanges and is presently receiving a nominal amount of frozen high-cost support. This support is in the process of being phased out. However, because of the delay in the implementation of Mobility Fund Phase II, Santa Rosa’s support is presently frozen at 60 percent of its baseline amount.<sup>1</sup> Thus, it is not possible at this time to indicate the precise date when the support will be eliminated entirely. The FCC is presently considering in a Further Notice of Proposed Rulemaking to maintain frozen support levels for wireline CETCs until winning bidders are announced in the Connect America Phase II competitive bidding process.<sup>2</sup> Were the Commission to adopt this proposal, Santa Rosa’s support would be at \$0 in two years from the resumption of the phase-down, which is well within the five-year term of Connect America Phase II. For this reason, the Company challenges the presumption that it is not an unsubsidized competitor in the census blocks being challenged.
  
2. Santa Rosa serves each of the census blocks being challenged. Specifically, the Company: (a) offers voice and broadband service meeting the FCC’s performance and pricing criteria in each of the census blocks, (b) has voice and broadband-capable physical assets in or adjacent to each of the census blocks, and (c) has customers or previously had customers in each of the census blocks.

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<sup>1</sup> *Connect America Fund et. al.*, WC Docket No. 10-90 et. al., Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161 (rel. Nov. 18, 2011), para. 519.

<sup>2</sup> *Connect America Fund et al.*, WC Docket No. 10-90 et. al., Report and Order, Declaratory Ruling, Order, Memorandum Opinion and Order, Seventh Order on Reconsideration, and Further Notice of Proposed Rulemaking, FCC 14-54 (rel. Jun. 10, 2014), para. 254.

3. In all of the census blocks being challenged, Santa Rosa offers a broadband speed tier of 6 Mbps down/1 Mbps up, which is the lowest tier offered that meets the FCC's performance requirements. A higher speed tier is also offered.

All broadband offerings in all of the challenged census blocks include unlimited usage and latency well below 100 ms.

4. In all of the census blocks being challenged, Santa Rosa offers stand-alone residential local voice service at a non-promotional rate ranging from \$17.05/month to \$20.50/month, depending on the exchange. (Rates do not include state and local taxes and fees.)
5. In all of the census blocks being challenged, Santa Rosa offers 6 Mbps down/1 Mbps up residential broadband service at a non-promotional rate of \$50.95. (Rate does not include applicable taxes and fees.)
6. Santa Rosa's website is <http://santarosatelco.com/>. The website advertises the Company's voice and broadband services to the communities in which the challenged census blocks are located. Those communities include: Aspermont/Old Glory, Kamay, Benjamin, Megargel, Rochester, Haskell, Knox City/O'Brien, Munday/Goree, Rule, Weinert, Holliday, and Seymour.