BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: 2012 State Annual certification of rural telecommunications carriers pursuant to 47 C.F.R. Section 54.314, High Cost Universal Service.	DOCKET NO. 110134-TL ORDER NO. PSC-11-0330-FOF-TL ISSUED: August 3, 2011

The following Commissioners participated in the disposition of this matter:

ART GRAHAM, Chairman
LISA POLAK EDGAR
RONALD A. BRISÉ
EDUARDO E. BALBIS
JULIE I. BROWN

ORDER GRANTING ANNUAL CERTIFICATION

BY THE COMMISSION:

I. Case Background

Section 254(e) of the Telecommunications Act of 1996 provides that a carrier that receives universal service support "... shall use that support only for the provision, maintenance, and upgrading of facilities and services for which the support is intended ..." In its Fourteenth Report and Order, Twenty-Second Order on Reconsideration, and Further Notice of Proposed Rulemaking in CC Docket No. 00-256 (the Rural Task Force Order; hereafter, the RTF Order), the Federal Communications Commission (FCC) modified its rules pertaining to the provision of high-cost support for rural telephone companies.

The FCC adopted a rule requiring that states who wish for rural carriers within their jurisdiction to receive federal high-cost support must file a certification annually with the FCC and with the Universal Service Administrative Company (USAC). This certification is to affirm that the federal high-cost funds flowing to rural carriers in the state, or to any competitive eligible telecommunications carriers seeking support for serving customers within a rural carrier's service area, will be used in a manner that comports with Section 254(e) of the Act. The code of Federal Regulations, 47 C.F.R. §54.314, *State certification of support for rural carriers*, provides in part:

> (a) *State certification.* States that desire rural incumbent local exchange carriers and/or eligible telecommunications carriers serving lines in the service area of a rural incumbent local exchange carrier within their jurisdiction to receive support pursuant to §§54.301 [local switching support], 54.305 [sale or transfer of exchanges], and/or 54.307 [support to competitive ETC] and/or part 36, subpart F of this chapter must file an annual certification with the Administrator and the Commission stating that all federal high-cost support provided to such carriers within that State will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended ...
>
> (b) ...
>
> (c) *Certification format.* A certification pursuant to this section may be filed in the form of a letter from the appropriate regulatory authority for the State, and shall be filed with both the Office of the Secretary of the Commission clearly referencing CC Docket No. 96-45, and with the Administrator of the high-cost universal service support mechanism, on or before the deadlines set forth paragraph (d) of this section . . .

The FCC requires that certifications for the next calendar funding year must be submitted by the preceding October 1; thus, in order for a rural carrier to be eligible for high-cost universal service support for all of calendar year 2012, certification must be submitted by October 1, 2011.

On March 17, 2005, the FCC released Order No. FCC 05-46 establishing new annual certification and reporting requirements to comply with the conditions of Eligible Telecommunication Carrier (ETC) designation and to ensure universal service funds are used for their intended purposes. In making its decision, the FCC believed that the new reporting requirements were reasonable and consistent with the public interest and the Act, and will further the FCC's goal of ensuring that ETCs satisfy their obligation under Section 214(e) of the Act to provide supported services throughout their designated service areas.

The FCC also believed that the administrative burden placed on carriers would be outweighed by strengthening the requirements and certification guidelines to help ensure that high-cost support is used in the manner that it was intended, and would help prevent carriers from seeking ETC status for purposes unrelated to providing rural and high-cost consumers with the access to affordable telecommunications and information services.

By Order No. PSC-05-0824-FOF-TL, issued August 15, 2005, as amended by Order No. PSC-05-0824A-FOF-TL, issued August 17, 2005, in Docket No. 010977-TL, we approved the establishment of the annual certification and reporting requirements. Each of the rural carriers seeking state certification for 2012 has complied with the new reporting requirements. This

order pertains to our certification of Florida's rural LECs for 2012 in accordance with the Code of Federal Regulations, 47 C.F.R. §54.314, *state certification of support for rural carriers.*

II. Analysis

Unless we submit certifications to the FCC and to the USAC by October 1, 2011, Florida's rural carriers will receive no interstate high-cost universal service funds during the first quarter of 2012, and would forego all federal support for that quarter. Certifications filed after October 1, 2011, would cause rural carriers to be eligible for high-cost funds for only partial quarters of 2012. For example, certifications filed by January 1, 2012, would allow rural carriers to be eligible for high-cost funds in the second, third, and fourth quarters of 2012. Certifications filed by April 1, 2012, would only allow rural carriers to be eligible for high-cost funds in the third and fourth quarters of 2012. The FCC anticipated that certain state commissions may have limited economic regulatory authority, as stated in the RTF Order:

> In the case of non-rural carriers, we concluded that states nonetheless may certify to the FCC that a non-rural carrier in the state had accounted to the state commission for its receipt of federal support, and that such support will be 'used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.' We determined that, in states in which the state commission has limited jurisdiction over such carriers, the state need not initiate the certification process itself. ... We conclude that this approach is equally appropriate here with regard to rural carriers and competitive eligible telecommunications carriers serving lines in the service area of a rural local exchange carrier. (RTF Order, ¶188)

On February 27, 2004, the Federal-State Joint Board on Universal Service (Joint Board) recommended that the FCC encourage states to use the annual ETC certification process to ensure that federal universal service support is used to provide the supported services and for associated infrastructure costs.[1] Annual review affords states the opportunity for a periodic review of ETC fund use.[2] Where an ETC fails to comply with the requirements in Section 214(e) of the Act and any additional requirements proposed by the state commission, the Joint Board noted that the state commission may decline to grant an annual certification or may

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[1] *See Federal-State Joint Board on Universal Service*, Recommended Decision, CC Docket No. 96-45, FCC 04J-1, pars. 46-48 (2004).

[2] *See Federal-State Joint Board on Universal Service*, Ninth Report and Order and Eighteenth Order on Reconsideration, CC Docket No. 96-45, FCC 99-306, par. 95 (1999) (*Ninth Report and Order*) (stating that accountability for the use of federal funds in the state ratemaking process is an appropriate mechanism to ensure that non-rural carriers use high-cost support for the provision, maintenance, and upgrading of facilities and services for which the support is intended); *see also Rural Task Force Order*, CC Docket 96-45, FCC 01-157, par. 187 (2001) (anticipating that states would take the appropriate steps to account for the receipt of high-cost support and ensure that federal support is being applied in a manner consistent with Section 254).

rescind a certification granted previously.[3] To date, there have been no indications that the rural ETCs are in violation of any of the provisions of Section 214(e) of the Act.

The FCC has noted that it may institute an inquiry on its own motion for companies for which it, rather than state commissions, has granted ETC status.[4] Such an inquiry could include an examination of the ETC's records and documentation to ensure that the high-cost support it receives is being used "only for the provision, maintenance, and upgrading of facilities and services." The FCC stated that failure to fulfill the requirements of the statute, its rules, and the terms of its designation order could result in the loss of the carrier's ETC designation.

As has been done in prior years, each of the Florida rural ETCs has provided the Commission with an affidavit (see Attachments A through H) in which they have certified that their use of interstate high-cost universal service support received during 2012 will comport with Section 254(e) of the Act and applicable FCC rules. Given these ETCs' certifications, we hereby certify to the FCC and to the USAC that for the year 2012 Windstream Florida, Inc., Frontier Communications of the South, LLC, GTC, Inc. d/b/a FairPoint Communications, ITS Telecommunications Systems, Inc., Northeast Florida Telephone Company d/b/a NEFCOM, Quincy Telephone Company d/b/a TDS Telecom/Quincy Telephone, Smart City Telecommunications, LLC d/b/a Smart City Telecom, and T-Mobile USA, Inc., will only use the federal high-cost support they receive for the provision, maintenance, and upgrading of facilities and services for which the support is intended.

This docket shall be closed and subsequent annual certifications of rural telephone companies shall be addressed in a new docket.

Based on the foregoing, it is

ORDERED by the Florida Public Service Commission that we certify to the FCC and to the USAC that for the year 2012 Windstream Florida, Inc., Frontier Communications of the South, LLC, GTC, Inc. d/b/a FairPoint Communications, ITS Telecommunications Systems, Inc., Northeast Florida Telephone Company d/b/a NEFCOM, Quincy Telephone Company d/b/a TDS Telecom/Quincy Telephone, Smart City Telecommunications, LLC d/b/a Smart City Telecom, and T-Mobile USA, Inc., will only use the federal high-cost support they receive for the provision, maintenance, and upgrading of facilities and services for which the support is intended. It is further

ORDERED that this docket shall be closed.

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[3] *Federal-State Joint Board on Universal Service,* Western Wireless Corporation Petition for Preemption of an Order of the South Dakota Public Utilities Commission, Declaratory Ruling, CC Docket No. 96-45, (2000), recon. pending (Section 214(e) Declaratory Ruling), par. 15.

[4] *See Federal-State Joint Board on Universal Service,* Memorandum Opinion and Order, CC Docket No. 96-45, FCC 04-37, par. 43 (2004).

By ORDER of the Florida Public Service Commission this 3rd day of August, 2011.

HONG WANG
Chief Deputy Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399
(850) 413-6770
www.floridapsc.com

PER

NOTICE OF FURTHER PROCEEDINGS OR JUDICIAL REVIEW

The Florida Public Service Commission is required by Section 120.569(1), Florida Statutes, to notify parties of any administrative hearing or judicial review of Commission orders that is available under Sections 120.57 or 120.68, Florida Statutes, as well as the procedures and time limits that apply. This notice should not be construed to mean all requests for an administrative hearing or judicial review will be granted or result in the relief sought.

Any party adversely affected by the Commission's final action in this matter may request: 1) reconsideration of the decision by filing a motion for reconsideration with the Office of Commission Clerk, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, within fifteen (15) days of the issuance of this order in the form prescribed by Rule 25-22.060, Florida Administrative Code; or 2) judicial review by the Florida Supreme Court in the case of an electric, gas or telephone utility or the First District Court of Appeal in the case of a water and/or wastewater utility by filing a notice of appeal with the Office of Commission Clerk, and filing a copy of the notice of appeal and the filing fee with the appropriate court. This filing must be completed within thirty (30) days after the issuance of this order, pursuant to Rule 9.110, Florida Rules of Appellate Procedure. The notice of appeal must be in the form specified in Rule 9.900(a), Florida Rules of Appellate Procedure.

Attachment A

Windstream Communications, Inc.
4001 Rodney Parham Road
1170 - B1F03-53A
Little Rock, AR 72212

(p) 501.748.5692
(f) 501.748.7996
(m) 501.690.5451

Bettye J. Willis
Vice President – State Government Affairs

windstream

May 16, 2011

110134-TL

RECEIVED-FPSC
11 MAY 17 AM 8:45
COMMISSION CLERK

Ms. Ann Cole, Director
Division of the Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 323399-0870

Re: Docket No. 010977-TL/Docket No. 090168-TL

Dear Ms. Cole:

Enclosed for filing in the above docket are the original and three (3) copies of the signed Affidavit of Cesar Caballero on behalf of Windstream Florida, Inc.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer.

Thank you for your assistance in this matter.

Sincerely,

Bettye Willis

Enclosure

cc: James White (Windstream)
Tim Loken (Windstream)

COM
APA
ECR
GCL
RAD 2
SSC
ADM
OPC
CLK

DOCUMENT NUMBER-DATE
03405 MAY 17 =
FPSC-COMMISSION CLERK

AFFIDAVIT

BEFORE ME, the undersigned authority appeared Cesar Caballero who deposed and said:

1. My name is Cesar Caballero. I am Windstream Florida, Inc.'s, ("Windstream" or the "Company") Vice President, Regulatory Strategy. I am an officer of the Company and am authorized to give this affidavit on behalf of the Company. This affidavit is being given to support the Florida Public Service Commission's certification as contemplated in 47 C.F.R. §54.314.

2. Windstream hereby certifies that it will only use the federal high-cost support it receives during 2012 for the provision, maintenance and upgrading of facilities and service for which such support is intended.

3. Windstream hereby certifies that it has submitted information required for its universal service filing and refers to these filings in lieu of providing formal network plans. USF disbursements received by the Company and other rural incumbent local exchange companies are divided into four categories: Interstate Common Line Support ("ICLS"), Local Switching Support ("LSS"); High Cost Loop Support ("HCLS"); and Safety Net Additive Support ("SNAS"). The FCC in conjunction with the Federal-State Joint Board on Universal Service has created each of these mechanisms, except ICLS. This means that representatives from State Commissions have also been involved in the development of these mechanisms through their representation in the Joint Board process.

ICLS is a universal service mechanism which allows these companies to recover from the fund the difference between their interstate common line costs and the subscriber line charge ("SLC") revenues collected from their customers. ICLS provides support to ILECs for investments and expenses already incurred.

LSS rules established by the FCC use the embedded costs of the rural ILECs associated with switching investments, depreciation, maintenance, expenses, taxes and an FCC prescribed rate of return. Therefore, LSS provides support to rural ILECs for investments and expenses already incurred. This amount is used to offset the rural ILECs' interstate switching revenue requirement. Therefore, the difference between the interstate switching revenue requirement again as set forth in the company's annual interstate cost study, and LSS is used to calculate the local switching rate charged to interexchange carriers.

Rural ILECs are eligible for HCLS based upon their embedded, unseparated loop costs. These costs are calculated using a set of complex algorithms approved by the FCC, the inputs for which are scrutinized by NECA. Therefore, HCLS provides support to rural ILECs for investments and expenses already incurred.

Pursuant to FCC Orders, SNAS is support above the HCL cap for carriers that make significant investments in rural infrastructure. To receive SNAS, a rural carrier must show that growth in telecommunications plant in service (TPIS) per line is at least 14 percent greater than the study area's TPIS in the prior year. Therefore, SNAS is providing support to rural ILECs for investments and expenses already incurred. Carriers seeking to qualify for safety net additive support must provide written notice to USAC that a study area meets the 14 percent TPIS trigger.

All of these programs are administered through USAC, a private, not-for-profit corporation. USAC assists NECA in data collection necessary for the remittance of universal service funds. What this means is that each company submits, no less frequently than annually, detailed information requested by NECA in the USF data collection process necessary for the remittance of universal service funds.

Rural ILECs must attest to the information submitted. Further, NECA and its auditors must attest to the validity and integrity of NECA's process. In other words, the ILEC cost studies and responses to data collection requests are subject to audit. The information provided in response to all of the universal service fund mechanisms utilizes FCC accounts for regulated costs and must be in compliance with FCC rules in Parts 32, 36, 54 and 64.

All cost studies submitted by rural ILECs, and all USF funding received by rural ILECs must be based upon financial statements. In addition, NECA performs focus reviews of cost studies as well as the USF filings for the cost companies involved in the NECA process. In addition, an officer of the rural ILEC must certify the accuracy and validity of the filed information.

HCLS data used in the HCLS calculations by NECA must also be filed with the FCC in October of each year. This data contains the regulated financial inputs into the algorithm as well as the number of loops that will receive universal service support.

Windstream is eligible for and receives ICLS.

4. Windstream hereby certifies that it follows appropriate procedures for network outage reporting in accordance with the Federal Outage Reporting Order and State Outage Reporting Requirements. For the period between March 1, 2010 and March 1, 2011, Windstream had ___0_ FCC reportable outages. Windstream had ___0____PSC reportable outages.

5. Windstream hereby certifies that it did fulfill all requests for service from potential customers.

6. Windstream hereby certifies that for the period from March 1, 2010 through March 1, 2011 it had ___0___ FCC complaint and ___6___state PSC complaints were received.

7. Windstream hereby certifies that it is able to function in emergency situations, offers a tariffed local usage plan and provides equal access to long distance carriers.

FURTHER AFFIANT SAYETH NOT.

Cesar Caballero
Vice President, Regulatory Strategy

STATE OF ARKANSAS
COUNTY OF PULASKI

Acknowledged before me this 11 th day of May 2011, by Cesar Caballero, as Vice President, Regulatory Strategy of Windstream Florida, Inc. who is personally known to me or produced identification and who did take an oath.

Sandra Jean Griffis
– Notary Public

SANDRA JEAN GRIFFIS NOTARY PUBLIC My Comm. Expires SEPT 1, 2011 SALINE COUNTY, ARK.

Personally Known ✓
Produced Identification _____
Type of Identification Produced _____

Attachment B

frontier
Communications Solutions
A CITIZENS COMMUNICATIONS COMPANY

RECEIVED-FPSC
11 MAY 20 AM 10:05
COMMISSION CLERK

Government & External Affairs
180 S. Clinton Ave.
5th Floor
Rochester, NY 14646

110134-TL

May 18, 2011

Beth Salak
Director, Division of Regulatory Analysis
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Frontier Communications of the South, LLC
Study Area Code: 210318
47 CFR § 54.314
Order No. PSC-05-0824-FOF-TL
Docket No. 110134-TL

Dear Ms. Salak:

This letter is to request that the Florida Public Service Commission notify the Federal Universal Fund Administrator and the Federal Communications Commission that Frontier Communications of the South, LLC ("Frontier") is eligible to receive federal high-cost support in accordance with the above-referenced statute, federal rule and docket.

The amount of federal high-cost support Frontier will receive in 2012 will continue to be used for the services and functionalities outlined in 47 C.F.R. §54.314 and, as the attached affidavit shows, Frontier certifies that it will only use the federal high-cost support it receives for the provision, maintenance and upgrading of facilities and service for which such support is intended.

This state certification for federal support will be an annual process. In order to receive federal support beginning January 1 of each year, the Florida Public Service Commission must file its annual certification on or before October 1 of the year before.

Frontier respectfully requests that the Commission notify the FCC prior to October 1 of this year that Frontier is eligible to receive federal high-cost support for 2012.

Sincerely,

Deborah Fasciano
Sr. Analyst – Regulatory Compliance

CC: Ann Cole
Commission Clerk
Florida Public Service Commission

Enclosure

11 MAY 20 AM 9:52

DOCUMENT NUMBER-DATE
03529 MAY 20 =
FPSC-COMMISSION CLERK

AFFIDAVIT

STATE OF NEW YORK
COUNTY OF MONROE

BEFORE ME, the undersigned authority, appeared Gregg C. Sayre, who deposed and said:

My name is Gregg Sayre. I am Assistant Secretary of Frontier Communications of the South, LLC ("Frontier" or the "Company"). As an officer of the Company, I am authorized to give this affidavit on behalf of the Company. This affidavit is being given to support the Florida Public Service Commission's certification as contemplated in 47 C.F.R. §54.314. Please refer to Docket No. 110134-TL.

Frontier hereby certifies that it will only use the federal high-cost support it receives during 2012 for the provision, maintenance and upgrading of facilities and service for which such support is intended.

1. Frontier Communications of The South currently holds ETC status and is an ILEC offering a ubiquitous network throughout the service area. The FCC has clarified that, for the ETCs that it designates, the "service quality improvements in the five-year plan do not necessarily require additional construction of network facilities." *FCC 05-46*, ¶ 23. In such situations, the FCC has stated that the ETC Applicant may provide "an explanation of why service improvements in a particular wire center are not needed and how funding will otherwise be used to further the provision of supported services in that area." *FCC 05-46*, ¶ 23.

   Because Frontier Communications of The South has coverage throughout the service area, the company will continue to use USF support to maintain its existing network, rather than to construct additional facilities to expand the coverage area. The company will replace and upgrade facilities and equipment on an "as needed" basis and for this reason, providing projected start and completion dates for projects, and specific geographic locations of such projects, is very difficult.

   Frontier has submitted via annual NECA filings, the supporting documentation on network improvements and expenditures in support of our universal service filing and refer to this in lieu of formal network plans.

2. Frontier experienced two outages that lasted more than 30 minutes and affected more than ten percent of the end users in its service area.

    a. Date and Time of Outage – August 8, 2010 at 11:37 CT to 12:30 CT (53 minutes)
    b. Cause – The office received a TS1 sync loss that sent the switch from a duplex to a simplex condition with A side CP online. The switch then had an unknown error on the A side that caused the CP sides to switch. Because of the precious error, the B side was not running which dropped the switch to a no service condition.
    c. Services Affected – Dial Tone
    d. Site – Molino-RNS 1
    e. Steps Taken – The cause of the unknown error was one of the communications buffer cards, which was replaced and spares were ordered.
    f. Customers affected – 1,293

    a. Date and Time of Outage – March 22, 2011 at 14:30 CT to March 23, 2011 at 10:50 CT (20:20 hrs)
    b. Cause – CISCO 15454 fiber terminal went out of service for unknown reasons.
    c. Services Affected – Toll Isolation
    d. Site – Molino RNS & Remotes
    e. Steps Taken – Problem was determined to be in the fiber MUX. Cisco vendor support was called in and was able to reset and restore the system, which restored the SS7 links. Frontier is working on an upgrade plan to replace the current configuration.
    f. Customers affected – 2,220

3. Frontier did not have any requests for service that were unfulfilled from March 1, 2010 through March 1, 2011.

4. Frontier certifies that for the period from March 1, 2010 through March 1, 2011 Frontier had two complaints. The rate of troubles per 1,000 access lines was 0.64.

5. Frontier certifies that the company is complying with applicable service quality standards and consumer protection rules, in accordance with Florida Statutes and the Florida Administrative Code.

6. Frontier hereby certifies that it is able to function in emergency situations.

7. Frontier is the incumbent LEC in the relevant exchange area and offers a tariffed local flat rate plan.

8. Frontier provides equal access to long distance carriers within its service area.

FURTHER AFFIANT SAYETH NOT.

Gregg C. Sayre
Assistant Secretary
Frontier Communications of the South, LLC

STATE OF NEW YORK
COUNTY OF MONROE

Acknowledged before me this 18th day of May 2011 by Gregg C. Sayre, as Assistant Secretary for Frontier Communications of the South, LLC, who is personally known to me or produced identification and who did take an oath.

NOTARY PUBLIC HOLLY M. JAMES
Notary Public, State of New York
Qualified in Monroe County
Registration No. 01JA4805438
My Commission Expires Nov. 30, 2014

Printed Name of Notary

Personally Known X
Produced Identification
Type of Identification Produced

Attachment C

FairPoint communications

908 West Frontview
Dodge City, Kansas 67801
Telephone 620 227 4400
Facsimile 620 227 8576
www.fairpoint.com

May 26, 2011

Ann Cole
Director, Division of Commission Clerk
& Administrative Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Betty Easley Conference Center, Room 110
Tallahassee, FL 32399

RE: Docket No 110134-TL

Dear Ms. Cole:

Enclosed for filing on behalf of GTC, Inc. d/b/a FairPoint Communications are original and 15 copies of the Affidavit of Patrick L. Morse. This Affidavit is filed in compliance with Order no. PSC-05-0824-FOF-TL issued August 15, 2005 as amended by Amendatory Order No. PSC-05 0824A-FOF-TL August 17, 2005, and by Order No. PSC-08-0551-FOF-TL issued August 20, 2008 in PSC Docket No 010977-TL.

Please contact R. Mark Ellmer at (850) 229-7315 or email mellmer@fairpoint.com if you have any questions regarding this filing.

Sincerely,

Patrick L. Morse
Senior Vice President
Governmental Affairs

Enclosures
Cc: R. Mark Ellmer w/enclosure
Chris Barron w/enclsoure

COM ___
APA ___
ECR ___
GCL 1
RAD 13
SSC ___
ADM ___
OPC ___
CLK ___

Attachment C

DOCKET NO. 110134-TL

AFFIDAVIT

BEFORE ME, the undersigned authority appeared Patrick L. Morse who deposed and said:

1. My name is Patrick L. Morse. I am employed by GTC, Inc. d/b/a FairPoint Communications (the "Company") as its Senior Vice President - Governmental Affairs. I am authorized to give this affidavit on behalf of the Company. This affidavit is being given to support the Florida Public Service Commission's certification as contemplated in 47 C.F.R. §54.314.

2. GTC, Inc. d/b/a FairPoint Communications hereby certifies that it will only use the federal high-cost support it receives during 2012 for the provision, maintenance and upgrading of facilities and service for which such support is intended.

3. GTC, Inc. d/b/a FairPoint Communications hereby certifies that it has submitted via annual NECA filings, the supporting documentation on network improvements and expenditures in support of our universal service filing and refer to this in lieu of formal network plans. USF disbursement received by the Company and other rural incumbent local exchange companies is divided into four categories: Interstate Common Line Support ("ICLS"), Local Switching Support ("LSS"), High Cost Loop Support ("HCLS") and Safety Net Additive Support ("SNAS"). Each of these mechanisms has been created by the FCC in conjunction with the Federal-State Joint Board on Universal Service. This means that representatives from State Commissions have also been involved in the development of these mechanisms through their representation in the Joint Board process.

ICLS is a universal service mechanism which is based upon each company's embedded, interstate loop costs and allows rate-of-return companies to offset interstate common line access charges and recover its interstate common line revenue requirement and still allow SLCs to remain affordable to customers. ICLS is reimbursing ILECs for investments and expenses already incurred. The ICLS calculation uses the interstate cost structure of a rural incumbent local exchange carrier ("ILEC") based upon annual interstate cost studies that are submitted and certified by the companies and received by NECA. The difference between the interstate common line revenue requirement, again as set forth in the company's annual interstate cost study and the SLC revenue collected from end users, makes up the ICLS.

LSS rules established by the FCC use the embedded costs of the rural ILECs associated with switching investments, depreciation, maintenance, expenses, taxes and an FCC established rate of return. Therefore, LSS is reimbursing ILECs for investments and expenses already incurred. This amount is used to offset the rural ILECs interstate switching revenue requirement. The difference between the interstate switching revenue requirement, again as set forth in the company's annual interstate cost study and LSS, makes up the switching rate which is charged to interexchange carriers.

The HCLS for rural ILECs is based upon each company's embedded, unseparated loop costs. These costs are calculated using a set of complex algorithms approved by the FCC, the inputs for which are scrutinized by NECA. Therefore, HCLS is reimbursing ILECs for investments and expenses already incurred.

Pursuant to the FCC Order, SNAS is support above the HCL cap for carriers that make significant investment in rural infrastructure in years in which HCL is capped. To receive SNAS, a rural carrier must show that growth in telecommunications plant in service (TPIS) per line is at least 14 percent greater than the study area's TPIS in the prior year. Therefore, SNAS is reimbursing ILECs for investments and expenses already incurred. Carriers seeking to qualify for safety net additive support must provide written notice to USAC that a study area meets the 14 percent TPIS trigger.

All of these programs are administered through the USAC. USAC, as a private, not-for-profit corporation, is responsible for providing every state and territory of the United States with access to affordable telecommunications service through the federal USF. USAC has contracted with NECA to assist in data collection necessary for the remittance of universal service funds. What this means is that each company submits, no less frequently than annually, detailed information requested by NECA in the USF data collection process.

Rural ILECs must attest to the information submitted. Further, NECA and its auditors must attest to the validity and integrity of NECA's process. In other words, the ILEC cost studies and responses to data collection requests are subject to audit. The information provided in response to all of the universal service fund mechanisms utilizes FCC accounts for regulated costs and must be in compliance with FCC rules in Parts 32, 36, 54 and 64.

All cost studies submitted by rural ILECs and all USF funding submitted by rural ILECs must be based upon financial statements. In addition, NECA performs focus reviews of cost studies as well as the USF filings for the cost companies involved in the NECA process. In addition, an officer of the rural ILEC must certify the accuracy and validity of the filed information.

HCLS data used in the HCLS calculations by NECA must also be filed with the FCC in October of each year. This data contains the regulated financial inputs into the algorithm as well as the number of loops that will receive universal service support.

4. GTC, Inc. d/b/a FairPoint Communications hereby certifies that it follows appropriate procedures for network outage reporting as per the Federal Outage Reporting Order and State Outage Reporting Requirements. For the period between March 1, 2010 and February 28, 2011, GTC, Inc. d/b/a FairPoint Communications did not have any Federal FCC reportable outages nor did the company have any State PSC reportable outages.

5. GTC, Inc. d/b/a FairPoint Communications hereby certifies that it did fulfill all requests for service from potential customers.

6. GTC, Inc. d/b/a FairPoint Communications hereby certifies that for the period from March 1, 2010 and February 28, 2011 seven FCC complaints were received, processed and resolved per FCC rules. During the same period six state PSC complaints were received, processed and resolved per PSC rules.

7. GTC, Inc. d/b/a FairPoint Communications hereby certifies that for the period ending February 28, 2011the company had norequests for service that was unfulfilled due to company construction requirements.

8. GTC, Inc. d/b/a FairPoint Communications hereby certifies that the company is complying with all applicable service qualify standards and consumer protection rules in accordance with Florida Statutes and Florida Administrative Code.

9. GTC, Inc. d/b/a FairPoint Communications hereby certifies that it is able to function in emergency situations, offers a tariffed local usage plan and provides equal access to long distance carriers.

FURTHER AFFIANT SAYETH NOT.

Patrick L. Morse
Senior Vice President - Governmental Affairs

STATE OF KANSAS

COUNTY OF FORD

Acknowledged before me, a notary public for the state of Kansas, this 26th day of May, 2011, by Patrick L. Morse, as Senior Vice President – Governmental Affairs, GTC, Inc. d/b/a FairPoint Communications, who is personally known to me or produced identification and who did take an oath.

NOTARY PUBLIC - State of Kansas
BETTYE J. YOUNG
My Appt. Exp. 11/16/14

Attachment D

ITS TELECOMMUNICATIONS SYSTEMS, INC.
15925 SW Warfield Blvd. • P. O. Box 277
Indiantown, Florida 34956
772-597-2111

June 8, 2011

Mrs. Ann Cole, Commission Clerk
Division of the Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

RE: FPSC Docket No. 110134-TL
2012 State Certification of Rural Telecommunication Carriers pursuant to 47 C.F.R.§54.314

Dear Mrs. Cole:

Enclosed for filing in the above referenced docket is the signed Affidavit of Don Pittman on behalf of ITS Telecommunications certifying that all federal high cost support received by ITS Telecommunications in 2012 will only be used for the provisioning, maintenance, and upgrading of facilities and services for which such support is intended.

Please contact me at 772-597-3161 if you have any questions regarding this filing.

Sincerely,

Donna J. Marreel
Regulatory Manager

Enclosure

Cc: Jim Polk (electronic)
Don Pittman, Vice President/CFO

FPSC DOCKET NO. 110134-TL
2012 State Certification of Rural Telecommunication Carriers Pursuant to
47 C.F.R. §54.314

AFFIDAVIT

STATE OF FLORIDA
COUNTY OF MARTIN

BEFORE ME, the undersigned authority, personally appeared Don Pittman, known to me to be a credible person and of lawful age, who deposed and said:

My name is Don Pittman. I am employed by ITS Telecommunications Systems, Inc. (ITS or the "Company") as Vice President/CFO. I possess substantial knowledge of the Company's operations and am an officer authorized to give this affidavit on behalf of the Company. This affidavit is being given to support the certification of the Florida Public Service Commission ("Commission") as contemplated in 47 C.F.R. §54.314.

ITS hereby certifies that it will utilize all federal high-cost support it receives during 2012 only for the provision, maintenance and upgrading of facilities and services for which the support is intended, consistent with 47 U.S.C. §254(e) of the Telecommunications Act of 1996.

1. In lieu of providing progress reports on a five-year service quality improvement plan, ITS submits that certain requirements, procedures and processes to which the Company adheres, and which are further explained in the following paragraphs, constitute the Company's progress report with respect to the receipt and utilization of federal universal service support. Under the existing rules and processes discussed the federal support funds received by the Company and other rural incumbent local exchange carriers ("ILECs") are, in fact, an integral part of the rural ILEC's recovery of expenditures incurred in the provision, maintenance and upgrading of its provision of universal service. Essentially, the Company receives federal universal service support ("USF") through various programs which are administered through the Universal Service Administrative Company ("USAC"). USAC has contracted with the National Exchange Carrier Association, Inc. ("NECA") to assist in data collection necessary for the remittance of USF. The company submits, not less frequently than annually, detailed information requested by NECA in the USF data collection process. USF data used in the USF calculations by NECA must also be filed with the FCC by November 1st of each year.

   Rural ILECs must attest to the information submitted. Further, NECA and its auditors must attest to the validity and integrity of NECA's process. In other words, the ILEC's cost studies and responses to data collection requests are subject to audit. The information provided in response to all of the universal service fund mechanisms utilizes FCC accounts for regulated costs and must be in compliance with FCC rules in Parts 32, 36, 54 and 64.

   All cost studies submitted by rural ILECs and all USF funding submitted by rural ILECs must be based upon financial statements. In addition, NECA performs focus reviews of cost studies as well as the USF filings for the cost companies involved in the NECA

process. In addition, an officer of the rural ILEC must certify the accuracy and validity of the filed information. This process ensures that the Company will not be deprived of the USF funding upon which the Company depends to provide rural telephone customers with affordable and quality telecommunications services.

The federal USF received by the Company and other rural ILECs is divided into four categories: High Cost Loop Support ("HCLS"); Local Switching Support ("LSS"); Interstate Common Line Support ("ICLS"); and Safety Net Additive Support ("SNAS"). Each of these mechanisms has been created by the FCC in conjunction with the Federal-State Joint Board on Universal Service. This means that representatives from State Commissions have also been involved in the development of these mechanisms through their representation in the Joint Board process.

HCLS for rural ILECs is based upon each company's embedded, unseparated loop cost. These costs are calculated using a set of complex algorithms approved by the FCC, the inputs for which are scrutinized by NECA. Therefore, HCLS is reimbursing ILECs for investments and expenses already incurred.

LSS rules established by the FCC use the embedded costs of the rural ILECs associated with switching investments, depreciation, maintenance, expenses, taxes and a FCC established rate of return. Therefore, LSS is reimbursing ILECs for investments and expenses already incurred. This amount is used to offset the rural ILECs interstate switching revenue requirement. The difference between the interstate switching revenue requirement, again as set forth in the company's annual interstate cost study and LSS, makes up the switching rate which is charged to interexchange carriers.

ICLS is a universal service mechanism, which is based upon each company's embedded, interstate loop cost and allows rate-of-return companies to offset interstate common line access charges and recover its interstate common line revenue requirement and still allow SLCs to remain affordable to customers. ICLS is reimbursing ILECs for investments and expenses already incurred. The ICLS calculation uses the interstate cost structure of a rural incumbent local exchange carrier ("ILEC") based upon annual interstate cost studies that are submitted and certified by the companies and received by NECA. The difference between the interstate common line revenue requirement, again as set forth in the Company's annual interstate cost study and the SLC revenue collected from end users, makes up the ICLS.

LSS rules established by the FCC use the embedded costs of the rural ILECs associated with switching investments, depreciation, maintenance, expenses, taxes and a FCC established rate of return. Therefore, LSS is reimbursing ILECs for investments and expenses already incurred. This amount is used to offset the rural ILECs interstate switching revenue requirement. The difference between the interstate switching

revenue requirement, again as set forth in the Company's annual interstate cost study and LSS, makes up the switching rate which is charged to interexchange carriers.

SNAS is support above the HCLS cap for carriers that make significant investment in rural infrastructure in years in which HCLS is capped. To receive this support, a rural ILEC must show that growth in telecommunications plant in service (TPIS) per line is at least 14 percent greater than the study area's TPIS in the prior year. Carriers seeking to qualify for SNAS must provide written notice to USAC that a study area meets the 14 percent TRIS trigger.

2. ITS hereby certifies that it follows appropriate procedures for network outage reporting as per the Federal Outage Reporting Order and State Outage Reporting Requirements. For the period between March 1, 2010 and March 1, 2011, ITS did not have any Federal FCC reportable outages.

   ITS had no State PSC reportable outages.

3. ITS hereby certifies that it did fulfill all requests for service from potential customers.

4. ITS hereby certifies that it received zero (0) FCC complaints during the period of March 1, 2010 through March 1, 2011. ITS received zero (0) complaints filed with the FPSC during the period March 1, 2010 to March 1, 2011.

5. ITS hereby certifies that it complies with the applicable state PSC quality of service standards and state consumer protection rules in accordance with Florida Statues and the Florida Administrative Code.

6. ITS hereby certifies that it is able to function in emergency situations.

7. ITS hereby certifies that it offers a tariffed local usage plan.

8. ITS hereby certifies that it provides equal access to long distance carriers.

Attachment D

FURTHER AFFIANT SAYETH NOT.

Don Pittman
Vice President/CFO
ITS Telecommunications Systems, Inc.

STATE OF FLORIDA
COUNTY OF MARTIN

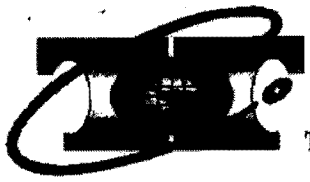
Acknowledged before me this 7th day of June, 2011 by Don Pittman, as Vice President of ITS Telecommunications Systems, Inc., who is personally known to me and did not take an oath.

EVA MARTINEZ
Comm# DD0817599
Expires 8/26/2012
Florida Notary Assn., Inc

Eva Martinez
Notary Public

Personally known ✓
Produced Identification _____
Type of Identification Produced _____

Attachment E



TOWNES TELECOMMUNICATIONS SERVICES CORPORATION

May 13, 2011

Florida Public Service Commission
Ann Cole, Commission Clerk
Office of Commission Clerk
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: FPSC Docket No. 110134-TL
Northeast Florida Telephone Company
State Certification of Rural Telecommunications Carriers Pursuant to
47 C.F.R. §54.314

Dear Ms. Cole:

Enclosed herewith for filing in the above referenced docket, is the signed affidavit of Northeast Florida Telephone Company, Inc. d/b/a/ NEFCOM ("NEFCOM") certifying that all federal high-cost support received by NEFCOM in 2012 will only be used for the provision, maintenance and upgrading of facilities and services for which such support is intended. In addition, NEFCOM has certified to the new ETC reporting requirements established by Order No. PSC-05-0824-FOF-TL, issued August 15, 2005 in the above referenced docket.

Please contact me at (904) 688-0029 should you have any questions regarding this filing.

Sincerely,

Deborah Nobles
Vice President of Regulatory Affairs

DN:

Enclosure

Cc: Robert J. Casey, FPSC Public Utilities Supervisor, Div of Competitive Markets & Enforcement
Mike Griffis, NEFCOM General Manager

505 Plaza Circle, Suite 200 • Orange Park, FL 32073 • (904) 688-0017 • (904) 688-0049 Fax

DOCKET NO. 110134-TL

AFFIDAVIT

STATE OF FLORIDA
COUNTY OF CLAY

BEFORE ME, the undersigned authority, appeared Deborah Nobles who deposed and said:

1. My name is Deborah Nobles. I am employed by Northeast Florida Telephone Company, Inc. d/b/a NEFCOM ("NEFCOM" or the "Company") as its Vice President of Regulatory Affairs. I am an officer of the Company and am authorized to give this affidavit on behalf of the Company. This affidavit is being given to support the Florida Public Service Commission's certification as contemplated in 47 C.F.R. §54.314.

2. NEFCOM hereby certifies that it will only use the federal high-cost support it receives during 2012 for the provision, maintenance and upgrading of facilities and service for which such support is intended.

3. NEFCOM hereby certifies that it has submitted via annual NECA filings, the supporting documentation on network improvements and expenditures in support of our universal service filing and refers to this in lieu of formal network plans. USF disbursement received by the Company and other rural incumbent local exchange companies is divided into four categories: Interstate Common Line Support ("ICLS"), Local Switching Support ("LSS"); High Cost Loop Support ("HCLS"); and Safety Net Additive Support ("SNAS"). The FCC in conjunction with the Federal-State Joint Board on Universal Service has created each of these mechanisms. This means that representatives from State Commissions have also been involved in the development of these mechanisms through their representation in the Joint Board process.

ICLS is a universal service mechanism which is based upon each companies embedded, interstate loop costs and allows rate-of-return companies to offset interstate common line access charges and recover its interstate common line revenue requirement and still allow SLCs to remain affordable to customers. ICLS is reimbursing ILECs for investments and expenses already incurred. The ICLS calculation uses the interstate cost structure of a rural incumbent local exchange carrier ("ILEC") based upon annual interstate cost studies that are submitted and certified by the companies and received by NECA. The difference between the interstate common line revenue requirement, again as set forth in the company's annual interstate cost study and the SLC revenue collected from end users, makes up the ICLS.

LSS rules established by the FCC use the embedded costs of the rural ILECs associated with switching investments, depreciation, maintenance, expenses, taxes and an FCC established rate of return. Therefore, LSS is reimbursing ILECs for investments and expenses already incurred. This amount is used to offset the rural ILECs' interstate switching revenue requirement. The difference between the interstate switching revenue requirement, again as set forth in the

company's annual interstate cost study and LSS, makes up the switching rate which is charged to interexchange carriers.

The HCLS for rural ILECs is based upon each company's embedded, unseparated loop costs. These costs are calculated using a set of complex algorithms approved by the FCC, the inputs for which are scrutinized by NECA. Therefore, HCLS is reimbursing ILECs for investments and expenses already incurred.

Pursuant to the FCC Order, SNAS is support above the HCL cap for carriers that make significant investment in rural infrastructure in years in which HCL is capped. To receive SNAS, a rural carrier must show that growth in telecommunications plant in service (TPIS) per line is at least 14 percent greater than the study area's TPIS in the prior year. Therefore, SNAS is reimbursing ILECs for investments and expenses already incurred. Carriers seeking to qualify for safety net additive support must provide written notice to USAC that a study area meets the 14 percent TPIS trigger.

All of these programs are administered through the USAC. USAC, as a private, not-for-profit corporation, is responsible for providing every state and territory of the United States with access to affordable telecommunications service through the federal USF. USAC has contracted with NECA to assist in data collection necessary for the remittance of universal service funds. What this means is that each company submits, no less frequently than annually, detailed information requested by NECA in the USF data collection process.

Rural ILECs must attest to the information submitted. Further, NECA and its auditors must attest to the validity and integrity of NECA's process. In other words, the ILEC cost studies and responses to data collection requests are subject to audit. The information provided in response to all of the universal service fund mechanisms utilizes FCC accounts for regulated costs and must be in compliance with FCC rules in Parts 32, 36, 54 and 64.

All cost studies submitted by rural ILECs and all USF funding submitted by rural ILECs must be based upon financial statements. In addition, NECA performs focus reviews of cost studies as well as the USF filings for the cost companies involved in the NECA process. In addition, an officer of the rural ILEC must certify the accuracy and validity of the filed information.

HCLS data used in the HCLS calculations by NECA must also be filed with the FCC in October of each year. This data contains the regulated financial inputs into the algorithm as well as the number of loops that will receive universal service support.

4. NEFCOM hereby certifies that it follows appropriate procedures for network outage reporting as per the Federal Outage Reporting Order and State Outage Reporting Requirements. For the period between March 1, 2010 and March 1, 2011, NEFCOM did not have any Federal FCC or State PSC reportable outages.

5. NEFCOM hereby certifies that it did fulfill all requests for service from potential customers.

6. NEFCOM hereby certifies that for the period from March 1, 2010 and March 1, 2011, zero FCC complaints and zero state PSC service complaints were received.

7. NEFCOM hereby certifies that it complies with the applicable state PSC quality of service standards, federal and state consumer protection rules, is able to function in emergency situations, offers a tariffed local usage plan and provides equal access to long distance carriers.

FURTHER AFFIANT SAYETH NOT.

Deborah Nobles
Vice President of Regulatory Affairs

STATE OF FLORIDA
COUNTY OF CLAY

Acknowledged before me this 13th day of May 2011, by Deborah Nobles, as Vice President of Regulatory Affairs of Northeast Florida Telephone Company, Inc. d/b/a NEFCOM, who is personally known to me or produced identification and who did take an oath.

Kim Jackson – Notary Public

KIM JACKSON
Commission DD 669912
Expires August 28, 2011

Personally Known ✓
Produced Identification _____
Type of Identification Produced _____

Attachment F

525 Junction Rd
Madison, WI 53717
www.tdstelecom.com

May 12, 2011

FILED ELECTRONICALLY
Ana Cole – Commission Clerk
Division of Communications Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 110134-TL; Quincy Telephone Company d/b/a TDS Telecom

Dear Ms. Cole;

This letter is to request that the Florida Public Service Commission notify the Universal Service Administrative Company (USAC) and the Federal Communications Commission (FCC) that Quincy Telephone Company d/b/a TDS Telecom/Quincy Telephone ("Quincy") is eligible to receive federal high-cost support in accordance with the above-referenced statute and federal rule.

The amount of federal high-cost support that Quincy will receive in 2012 will continue to be used for the services and functionalities outlined in 47 C.F.R. §54.101(a) and as the attached affidavit shows Quincy certifies that it will only use the federal high-cost support it receives for the provision, maintenance and upgrading of facilities and service for which such support is intended.

This state certification for federal support is an annual process. In order to receive federal support beginning January 1 of each year, the Florida Public Service Commission must file its annual certification on or before October 1 of the year before.

Quincy respectfully requests that the Commission notify the FCC prior to October 1 of this year that Quincy is eligible to receive federal high-cost support for 2012. If there any questions, please contact Tom McCabe at 850-875-5207.

Regards,

Bruce Schiefelbein
Manager, Regulatory Compliance

Attachment
cc: Beth Salak
Tom McCabe (TDS Telecom)

DOCKET NO. 110134-TL

AFFIDAVIT

BEFORE ME, the undersigned authority appeared Kevin G. Hess who deposed and said:

My name is Kevin G. Hess. I am employed by TDS Telecommunications Corporation, the parent company of Quincy Telephone Company d/b/a TDS Telecom/Quincy ("TDS" or the "Company") as its Senior Vice President, Government & Regulatory Affairs. I am an officer of the Company and am authorized to give this affidavit on behalf of the Company. This affidavit is being given to support the Florida Public Service Commission's certification as contemplated in 47 C.F.R. §54.314.

TDS hereby certifies that it will only use the federal high-cost support it receives during 2012 for the provision, maintenance and upgrading of facilities and service for which such support is intended.

1. TDS hereby certifies that it has submitted via annual NECA filings, the supporting documentation on network improvements and expenditures in support of our universal service filing and refers to this in lieu of formal network plans. USF disbursement received by the Company and other rural incumbent local exchange companies is divided into four categories: Interstate Common Line Support ("ICLS"), Local Switching Support ("LSS"); High Cost Loop Support ("HCLS"); and Safety Net Additive Support ("SNAS"). Each of these mechanisms has been created by the FCC in conjunction with the Federal-State Joint Board on Universal Service. This means that representatives from State Commissions have also been involved in the development of these mechanisms through their representation in the Joint Board process.

ICLS is a universal service mechanism which is based upon each companies embedded, interstate loop costs and allows rate-of-return companies to offset interstate common line access charges and recover its interstate common line revenue requirement and still allow SLCs to remain affordable to customers.. ICLS is reimbursing ILECs for investments and expenses already incurred. The ICLS calculation uses the interstate cost structure of a rural incumbent local exchange carrier ("ILEC") based upon annual interstate cost studies that are submitted and certified by the companies and received by NECA. The difference between the interstate common line revenue requirement, again as set forth in the company's annual interstate cost study and the SLC revenue collected from end users, makes up the ICLS.

LSS rules established by the FCC use the embedded costs of the rural ILECs associated with switching investments, depreciation, maintenance, expenses, taxes and an FCC established rate of return. Therefore, LSS is reimbursing ILECs for investments and expenses already incurred. This amount is used to offset the rural ILECs' interstate switching revenue requirement. The difference between the interstate switching revenue requirement, again as set forth in the company's annual interstate cost study and LSS, makes up the switching rate which is charged to interexchange carriers.

Attachment F

The HCLS for rural ILECs is based upon each company's embedded, unseparated loop costs. These costs are calculated using a set of complex algorithms approved by the FCC, the inputs for which are scrutinized by NECA. Therefore, HCLS is reimbursing ILECs for investments and expenses already incurred.

Pursuant to the FCC Order, SNAS is support above the HCL cap for carriers that make significant investment in rural infrastructure in years in which HCL is capped. To receive SNAS, a rural carrier must show that growth in telecommunications plant in service (TPIS) per line is at least 14 percent greater than the study area's TPIS in the prior year. Therefore, SNAS is reimbursing ILECs for investments and expenses already incurred. Carriers seeking to qualify for safety net additive support must provide written notice to USAC that a study area meets the 14 percent TPIS trigger.

All of these programs are administered through the USAC. USAC, as a private, not-for-profit corporation, is responsible for providing every state and territory of the United States with access to affordable telecommunications service through the federal USF. USAC has contracted with NECA to assist in data collection necessary for the remittance of universal service funds. What this means is that each company submits, no less frequently than annually, detailed information requested by NECA in the USF data collection process.

Rural ILECs must attest to the information submitted. Further, NECA and its auditors must attest to the validity and integrity of NECA's process. In other words, the ILEC cost studies and responses to data collection requests are subject to audit. The information provided in response to all of the universal service fund mechanisms utilizes FCC accounts for regulated costs and must be in compliance with FCC rules in Parts 32, 36, 54 and 64.

All cost studies submitted by rural ILECs and all USF funding submitted by rural ILECs must be based upon financial statements. In addition, NECA performs focus reviews of cost studies as well as the USF filings for the cost companies involved in the NECA process. In addition, an officer of the rural ILEC must certify the accuracy and validity of the filed information.

HCLS data used in the HCLS calculations by NECA must also be filed with the FCC in October of each year. This data contains the regulated financial inputs into the algorithm as well as the number of loops that will receive universal service support.

2. TDS hereby certifies that it follows appropriate procedures for network outage reporting as per the Federal Outage Reporting Order and State Outage Reporting Requirements. For the period between March 1, 2010 and March 1, 2011, TDS had one Federal FCC reportable outage and no State PSC reportable outages.

3. TDS hereby certifies that it did fulfill all requests for service from potential customers.

4. TDS hereby certifies that for the period from March 1, 2010 and March 1, 2011 one FCC complaint was received and no state PSC complaints were received.

Attachment F

DOCKET NO. 110134-TL
Page 3 of 3

5. TDS hereby certifies that it made all reasonable efforts to comply with applicable service quality standards and consumer protection rules, in accordance with Florida Statutes and the Florida Administrative Code.

6. TDS hereby certifies that it is able to function in emergency situations.

7. TDS already provides equal access to long distance carriers.

FURTHER AFFIANT SAYETH NOT.

Kevin G. Hess
Senior Vice President
Government & Regulatory Affairs

STATE OF WISCONSIN
COUNTY OF DANE

Acknowledged before me this 12th day of May, 2011, by Kevin G. Hess, as Senior Vice President, Government & Regulatory Affairs of TDS Telecommunications Corporation d/b/a TDS TELECOM/Quincy Telephone, who is personally known to me or produced identification and who did take an oath.

Kristin M. Statz - Notary Public
My Commission expires: June 5, 2013

Personally Known Yes
Produced Identification Yes
Type of Identification Produced Drivers License

Attachment G

SmartCity.

RECEIVED-FPSC
11 MAY 18 PM 3:34
COMMISSION
CLERK

May 17, 2011

www.smartcity.com

SENT VIA FEDERAL EXPRESS

Ms. Ann Cole
Commission Clerk
Office of Commission Clerk
Florida Public Service Commission
Capital Circle Office Center
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Docket No. 110134-TL
State Certification of Rural Telecommunications Carriers Pursuant to 47 C.F.R. §54.314

Dear Ms. Cole:

Enclosed for filing in the above referenced Docket, is an original and fifteen (15) copies of the signed Affidavit of James T. Schumacher on behalf of Smart City Telecommunications LLC d/b/a Smart City Telecom.

Should you have any questions, please contact me at (407) 828-6730.

Sincerely,

Lynn B. Hall
Director – Customer Support, Contracts and Regulatory Affairs

Enclosures

cc: Robert J. Casey, FPSC
Jim Polk, FPSC

COM ____
APA ____
ECR ____
GCL 1
RAD 14
SSC ____
ADM ____
OPC ____
CLK ____

DOCUMENT NUMBER-DATE
03476 MAY 18 =
FPSC-COMMISSION CLERK

Post Office Box 22555 Lake Buena Vista, FL 32830 Phone (407) 827-2000 Fax (407) 828-6651

Florida Public Service Commission
Docket No. 110134-TL

AFFIDAVIT

BEFORE ME, the undersigned authority, appeared **James T. Schumacher**, who deposed and said:

1. My name is James T. Schumacher. I am employed by Smart City Telecommunications LLC d/b/a Smart City Telecom ("Smart City Telecom" or the "Company") as its Vice President – Finance and Administration. I am an officer of the Company and am authorized to give this affidavit on behalf of the Company. This affidavit is being given to support the Florida Public Service Commission's certification as contemplated in 47 C.F.R. §54.314.

2. Smart City Telecom hereby certifies that it will only use the federal high-cost support it receives during 2012 for the provision, maintenance and upgrading of facilities and service for which such support is intended.

3. Smart City Telecom hereby certifies that it has submitted via annual NECA filings, the supporting documentation on network improvements and expenditures in support of its universal service filing and refers to this in lieu of formal network plans. USF disbursement received by the Company and other rural incumbent local exchange companies is divided into four categories: Interstate Common Line Support ("ICLS"), Local Switching Support ("LSS"); High Cost Loop Support ("HCLS"); and Safety Net Additive Support ("SNAS"). Each of these mechanisms has been created by the FCC in conjunction with the Federal-State Joint Board on Universal Service. This means that representatives from State Commissions have also been involved in the development of these mechanisms through their representation in the Joint Board process.

ICLS is a universal service mechanism which is based upon each companies embedded, interstate loop costs and allows rate-of-return companies to offset interstate common line access charges and recover its interstate common line revenue requirement and still allow SLCs to remain affordable to customers. ICLS is reimbursing incumbent local exchange carriers ("ILECs") for investments and expenses already incurred. The ICLS calculation uses the interstate cost structure of a rural ILEC based upon annual interstate cost studies that are submitted and certified by the companies and received by NECA. The difference between the interstate common line revenue requirement, again as set forth in the company's annual interstate cost study and the SLC revenue collected from end users, makes up the ICLS.

LSS rules established by the FCC use the embedded costs of the rural ILECs associated with switching investments, depreciation, maintenance, expenses, taxes and an FCC established rate of return. Therefore, LSS is reimbursing ILECs for investments and expenses already incurred. This amount is used to offset the rural ILECs' interstate switching revenue requirement. The difference between the interstate switching revenue requirement, again as set forth in the

company's annual interstate cost study and LSS, makes up the switching rate which is charged to interexchange carriers.

The HCLS for rural ILECs is based upon each company's embedded, unseparated loop costs. These costs are calculated using a set of complex algorithms approved by the FCC, the inputs for which are scrutinized by NECA. Therefore, HCLS is reimbursing ILECs for investments and expenses already incurred.

Pursuant to the FCC Order, SNAS is support above the HCL cap for carriers that make significant investment in rural infrastructure in years in which HCL is capped. To receive SNAS, a rural carrier must show that growth in telecommunications plant in service (TPIS) per line is at least 14 percent greater than the study area's TPIS in the prior year. Therefore, SNAS is reimbursing ILECs for investments and expenses already incurred. Carriers seeking to qualify for safety net additive support must provide written notice to USAC that a study area meets the 14 percent TPIS trigger.

All of these programs are administered through the USAC. USAC, as a private, not-for-profit corporation, is responsible for providing every state and territory of the United States with access to affordable telecommunications service through the federal USF. USAC has contracted with NECA to assist in data collection necessary for the remittance of universal service funds. What this means is that each company submits, no less frequently than annually, detailed information requested by NECA in the USF data collection process.

Rural ILECs must attest to the information submitted. Further, NECA and its auditors must attest to the validity and integrity of NECA's process. In other words, the ILEC cost studies and responses to data collection requests are subject to audit. The information provided in response to all of the universal service fund mechanisms utilizes FCC accounts for regulated costs and must be in compliance with FCC rules in Parts 32, 36, 54 and 64.

All cost studies submitted by rural ILECs and all USF funding submitted by rural ILECs must be based upon financial statements. NECA also performs focus reviews of cost studies as well as the USF filings for the cost companies involved in the NECA process. In addition, an officer of the rural ILEC must certify the accuracy and validity of the filed information.

HCLS data used in the HCLS calculations by NECA must also be filed with the FCC in October of each year. This data contains the regulated financial inputs into the algorithm as well as the number of loops that will receive universal service support.

4. SCT hereby certifies that it follows appropriate procedures for network outage reporting as per the Federal Outage Reporting Order and State Outage Reporting Requirements. For the period between March 1, 2010 and March 1, 2011, SCT did not have any Federal FCC reportable outages or Florida Public Service Commission reportable outages.

5. SCT hereby certifies that it did fulfill all requests for service from potential customers.

6. SCT hereby certifies that for the period from March 1, 2010 and March 1, 2011 no Florida Public Service Commission or FCC complaints were received.

7. SCT hereby certifies that it is able to function in emergency situations, offers a tariffed local usage plan and provides equal access to long distance carriers.

FURTHER AFFIANT SAYETH NOT.

James T. Schumacher
Vice President – Finance and Administration

STATE OF FLORIDA
COUNTY OF ORANGE

Acknowledged before me this 17th day of May, 2011, by James T. Schumacher, as Vice President – Finance and Administration of Smart City Telecommunications LLC d/b/a Smart City Telecom, who is personally known to me or produced identification and who did take an oath.

Lynn B. Hall
Notary Public – State of Florida

Personally Known X
Produced Identification _____
Type of Identification Produced _____

LYNN B. HALL
Notary Public - State of Florida
My Commission Expires Jul 23, 2011
Commission # DD 887009

Florida Public Service Commission
Docket No. 110134-TL

AFFIDAVIT

State of Washington)
) ss:
County of King)

BEFORE ME, the undersigned authority, personally appeared H. Skip Cornett, known to me to be a credible person and of lawful age, who deposed and said:

My name is H. Skip Cornett, I am employed as Vice President of Tax at T-Mobile USA, Inc., the parent company of T-Mobile South LLC, doing business as T-Mobile ("T-Mobile" or the "Company"). I am an officer of T-Mobile and am authorized to provide this affidavit on behalf of the Company. This affidavit is being given to support the certification of the Florida Public Service Commission ("Commission") as contemplated in 47 C.F.R. §§ 54.209, 54.313 and 54.314.

Company hereby certifies the following:

1. T-Mobile, a commercial mobile radio service provider as defined under 47 C.F.R. §20.3, was recently designated as an Eligible Telecommunications Carrier ("ETC") and authorized by the Commission on August 18, 2010 and August 19, 2010, in Docket No. 090510-TP (Order No. PSC-10-0478-PAA-TP) and Docket No. 090507-TP (Order No. PSC-10-0475-PAA-TP), and as amended by the Commission on September 29, 2010 in Docket No. 100383-TP (Order No. PSC-10-0597-PAA-TP), to receive high-cost universal service funds in certain non-rural incumbent local exchange telecommunications company ("ILEC") wire centers and rural ILEC study areas ("Service Area") within the state of Florida.

2. T-Mobile will only use federal high cost support during 2012 for the provision, maintenance and upgrading of facilities and service for which such support is intended consistent with applicable laws.

3. In support of its Petition for Recertification as an ETC, T-Mobile submits to the Commission as Exhibit A, a review of the actual Federal High Cost Universal Service Fund receipts and expenditures in 2010. T-Mobile also submits, as Exhibit B, a five-year service improvement plan ("SIP") commencing in 2011 and going through 2015, which includes a map detailing the company's progress toward meeting its plan targets, along with a request for confidential treatment for both documents under Section 364.183(1) of the Florida Statutes. T-Mobile's SIP details annual expenditures that will greatly exceed projected annual universal service support to improve signal quality, coverage, and capacity within its designated ETC Service Area. In particular, T-Mobile has initiated several projects aimed at increasing its coverage in its ETC Service Area and improving customer experience through signal quality, capacity and other network enhancements.

Florida Public Service Commission
Docket No. 110134-TL

4. T-Mobile follows appropriate procedures for network outage reporting consistent with 47 C.F.R. Part 4. T-Mobile submits, as Exhibit C, a report detailing the outages incurred in Florida in 2010, along with a request for confidential treatment under Section 364.183(1) of the Florida Statutes. T-Mobile certifies that it will continue to track all reportable network outages and report accordingly in subsequent annual reports. T-Mobile evaluates each network outage on a case-by-case basis to determine the cause of the outage, the impact on customers, T-Mobile's ability to meet its service provisioning obligations, including the availability of 911 services, and the steps that can be taken to prevent future outages. T-Mobile will remain vigilant to prevent outages in the future.

5. T-Mobile tracks customer complaints and requests for service. T-Mobile submits, as Exhibit D, the number of complaints per 1,000 handsets in Florida in 2010 along with a request for confidential treatment under Section 364.183(1) of the Florida Statutes. T-Mobile did not have any unfulfilled requests for service, as defined by 47 C.F.R. § 54.209(a)(3), in unserved or underserved areas from potential customers in Florida in 2010. T-Mobile will continue to report customer complaints and requests for service and the steps taken to respond to them in future annual reports and updates, as necessary.

6. T-Mobile is a signatory to the CTIA Consumer Code for Wireless Service, which is the applicable service quality and consumer protection standard for wireless carriers, and has been certified by CTIA as being complaint with the code.[1] T-Mobile submits, as Exhibit E, a copy of its most recent certification provided by CTIA. T-Mobile hereby certifies that it is complying with applicable service quality standards and consumer protection rules for the areas in which it was designated as an ETC in Florida.

7. T-Mobile advertises its universal service and Lifeline and Link Up offerings in media of general distribution as required. T-Mobile submits, as Exhibit F, a summary and evidence of its advertising and outreach efforts in 2010. T-Mobile is complying with applicable universal service and Lifeline and Link Up requirements for the areas in which it was designated as an ETC in Florida.

8. T-Mobile is able to function in emergency situations as set forth in Section 54.201(a)(2), which includes "a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations."[2] In particular, T-Mobile has the following capabilities to remain functional in emergency situations:

[1] *See* CTIA Consumer Code for Wireless Service, *available at* http://files.ctia.org/pdf/The_Code.pdf. Signatories to the CITA Consumer Code agree to: (1) disclose rates and terms of service to consumers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6); separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of customer privacy. T-Mobile was certified by CTIA as being compliant with this code on June 22, 2010.
[2] 47 C.F.R. § 54.202(a)(2).

Florida Public Service Commission
Docket No. 110134-TL

- Availability of fixed and portable back-up power generators at various network locations throughout T-Mobile's network that can be deployed in emergency situations.
- Ability to reroute traffic around damaged or out-of-service facilities through the deployment of cell-on-wheels ("COWs"), redundant facilities, and dynamic rerouting of traffic over alternate facilities.
- A network control center that monitors network traffic and anticipates traffic spikes, and can then (i) deploy network facilities to accommodate capacity needs, (ii) change call routing translations, and (iii) deploy COWs to temporarily meet traffic needs until longer-term solutions, such as additional capacity and antenna towers can be deployed.
- The majority of sites not equipped with fixed generators have battery back up systems installed to maintain service in the event of a widespread power outage.

9. T-Mobile makes available several different rate plans with varying amounts of local usage and different calling areas that are comparable to the offerings of the ILECs. Attached as Exhibit G is a list of some of T-Mobile's currently offered rate plans. T-Mobile hereby certifies that it is offering a local usage plan comparable to that offered by the ILECs in the areas in which it was designated as an ETC.

10. T-Mobile recognizes that the Commission may require it to provide equal access to long distance carriers in the event that no other ETC is providing equal access within its service area.

H/Cornett — Signature

6/8/11 — Date

H. Skip Cornett

Business Address:
T-Mobile USA, Inc.
12920 SE 38th Street
Bellevue, WA 98006

Subscribed and sworn to before me this 8th day of June, 2011.

Stephanie M Phillips
Notary Public

STEPHANIE M PHILLIPS NOTARY PUBLIC STATE OF WASHINGTON COMMISSION EXPIRES 06-29-12