

**Eric Fryson**

---

**From:** Loken, Tim P [Tim.P.Loken@windstream.com]  
**Sent:** Friday, July 06, 2012 10:37 AM  
**To:** Filings@psc.state.fl.us  
**Cc:** Willis, Bettye J; Beth Salak  
**Subject:** E-Filing (Docket No. 120150-TL - 2013 State Certification of Rural Telecommunications Carriers  
**Attachments:** Windstream FL ETC Recertification2.pdf

Electronic Filing

a. Person responsible for this electronic filing:

Tim P. Loken, Director Regulatory Reporting  
Windstream/Windstream Florida, Inc.  
4001 Rodney Parham Road  
Little Rock, AR 72212  
501-748-7442

[tim.p.loken@windstream.com](mailto:tim.p.loken@windstream.com)

b. Docket No. 120150-TL

In re: 2013 State certification of rural telecommunications carriers.

c. Document being filed on behalf of Windstream Florida, Inc.

d. There are a total of 4 pages

e. The revised document attached for electronic filing is Windstream Florida, Inc. annual ETC Recertification as required by Federal Communications Commission (FCC) rule 47 C.F.R 54.314.

(See attached file: Windstream FL ETC Recertification2.pdf)

Thank you for your attention and cooperation to this request.

Tim Loken  
Director Regulatory Reporting  
501-748-7442

---

The information contained in this message, including attachments, may contain privileged or confidential information that is intended to be delivered only to the person identified above. If you are not the intended recipient, or the person responsible for delivering this message to the intended recipient, Windstream requests that you immediately notify the sender and asks that you do not read the message or its attachments, and that you delete them without copying or sending them to anyone else.

DOCUMENT NUMBER-DATE

04495 JUL-6 2012

FPSC-COMMISSION CLERK

7/6/2012



4001 Rodney Parham Drive • Little Rock, Arkansas 72212  
(501) 748-7000

**Tim Loken**  
Director – Regulatory Reporting  
Tim.p.loken@windstream.com  
(501) 748-7442  
(501) 748-6583 (fax)

July 5, 2012

Filed Electronically  
Ann Cole – Commission Clerk  
Division of Communications Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 3299-0850

**Re: Docket No 120150-TL Windstream Florida, Inc.**

Dear Ms. Cole,

The attached affidavit includes revisions based on comments from Staff.

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 Windstream Florida, Inc. ("Windstream") 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 Windstream will receive in 2013 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 Windstream 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.

Windstream respectfully requests that the Commission notify the FCC prior to October 1 of this year that Windstream is eligible to receive federal high-cost support for 2013.

Please let me know if you have any questions.

Sincerely,

Tim Loken  
Director Regulatory Reporting

Cc: Beth Salak  
Bettye Willis (Windstream)

RECEIVED  
JUL 10 2012

DOCUMENT NUMBER - DATE

04495 JUL -6 12

FPSC - COMMISSION CLERK

## AFFIDAVIT

BEFORE ME, the undersigned authority appeared John Eichler who deposed and said:

1. My name is John Eichler. I am Windstream Florida, Inc.'s, ("Windstream" or the "Company") Controller. 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 certifies that all federal high-cost and CAF support was used in the proceeding calendar year and will be used in the new calendar year only for the provision, maintenance, and upgrading of facilities and services for which the 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.

04495 JUL -6 2

FPSC-COMMISSION CLERK

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.

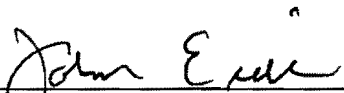
4. Windstream hereby certifies that it follows appropriate procedures for network outage reporting in accordance with the Federal Outage Reporting Order and State Outage Reporting Requirements. For the period between March 1, 2011 and March 1, 2012, Windstream had 2 FCC reportable outages. Windstream 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, 2011 through March 1, 2012 it had 13 FCC complaint and 4 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.

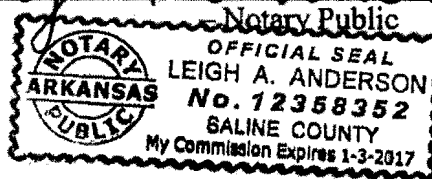
FURTHER AFFIANT SAYETH NOT.

  
\_\_\_\_\_  
John Eichler  
Controller

STATE OF ARKANSAS  
COUNTY OF PULASKI

Acknowledged before me this \_\_\_th day of July 2012, by John Eichler, as Controller of Windstream Florida, Inc. who is personally known to me or produced identification and who did take an oath.

*Leigh A. Anderson*



Personally Known  \_\_\_\_\_  
Produced Identification \_\_\_\_\_  
Type of Identification Produced \_\_\_\_\_