

**DOCKET NO. UM 1688**

**Cover Sheet for Submission of  
2014 Annual ETC Certification Reports**

Name of Eligible Telecommunications Carrier: Citizens Telecommunications Company of Oregon, Inc. d/b/a Frontier Communications of Oregon

Filing date: June 19, 2014

Is this: Original submission?  X \_\_\_\_\_

OR

Revised submission? \_\_\_\_\_

Person to contact for questions:

Name Kim Douglass

Phone number 972-908-4415

E-mail address kimberly.a.douglass@ftr.com

Documents included in this filing (please check applicable items):

\_\_\_\_\_ CAF/ICC Support (47 CFR § 54.304)

\_\_\_\_\_ Rate Floor Data (47 CFR § 54.313(h))

X Form 481 (High-cost per 47 CFR § 54.313, Low-income per 54.422)<sup>1</sup>

\_\_\_\_\_ Form 690 (Mobility Fund per 47 CFR § 54.1009)

X Affidavit for High-Cost Support

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**Filing deadlines:** The deadlines for filing items required by 47 CFR § 54 are the same as the deadlines for filing with the FCC. The notarized affidavit for high-cost support must be filed no later than the due date for the FCC Form 481. Based on current information, it appears that all items other than CAF/ICC support data are due by July 1, 2014. The CAF/ICC support data are due the same day as the ETC's interstate access tariff filing.

If revisions to an original submission are filed with the FCC or USAC, a copy of the revisions must be filed with the Oregon Commission no later than five business days following submission to the FCC or USAC.

\_\_\_\_\_  
<sup>1</sup> Lifeline-only ETCs must provide all information specified in 47 CFR § 54.422(b) even if the ETC does not submit this information to the FCC.

AFFIDAVIT CERTIFYING USE OF UNIVERSAL SERVICE FUNDS

I, Kenneth Mason, being of lawful age and duly sworn, on my oath, state that I am the Vice President – Business Operations of Citizens Telecommunications Company of Oregon, Inc. d/b/a Frontier Communications of Oregon and that I am authorized to execute this Affidavit on behalf of the Company, and the facts set forth in this Affidavit are true to the best of my knowledge, information and belief.

Pursuant to the requirements of the Federal Communications Commission, 47 C.F.R. § 54.314, Citizens Telecommunications Company of Oregon, Inc. d/b/a Frontier Communications of Oregon hereby certifies to the Public Utility Commission of Oregon that it is eligible to receive federal high-cost support for the program years cited.

I attest that all federal high-cost support provided to Citizens Telecommunications Company of Oregon, Inc. d/b/a Frontier Communications of Oregon in Oregon was used in the preceding calendar year (2013) and will be used in the coming calendar year (2015) only for the provision, maintenance and upgrading of facilities and services for which the support is intended.

DATED this 17<sup>th</sup> day of June, 2014.

By: [Signature] (Officer's Name)

Its: Vice President - Regulatory (Officer's Title)

SUBSCRIBED AND SWORN to before me this 17<sup>th</sup> day of June, 2014.

[Signature]

Notary public in and for the State of New York

My Commission Expires: 8/14/2017

DEBORAH M. FASCIANO  
Notary Public, State of New York  
Qualified in Monroe County  
No. 01FA5048034  
My Commission Expires 8/14/2017



Federal Regulatory Affairs  
2300 N St. NW, Suite 710 Washington DC 20037  
www.Frontier.com

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**REDACTED—FOR PUBLIC INSPECTION**

June 18, 2014

**BY HAND**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St., S.W.  
Washington, D.C. 20554

Re: *Connect America Fund*, WC Dkt. No. 10-90; *Lifeline and Link Up Reform and Modernization*, WC Dkt. No. 11-42

Dear Ms. Dortch:

Frontier Communications Corp. hereby files its annual report and certifications as required by sections 54.313 and 54.422 of the Commission's rules. Today Frontier is filing only the documents relevant to the companies listed below. Frontier will complete its filings for all of its companies by the Commission's July 1, 2014 filing deadline. A copy of this report is also being filed with the Universal Service Administrative Company, each relevant State public service commission in which Frontier operates as an ETC, and relevant authorities and Tribal governments pursuant to Section 54.313(i) of the Commission's rules.<sup>1</sup>

Portions of this filing are being made confidentially in accordance with the Federal Communications Commission's ("Commission") *Third Protective Order* in this docket.<sup>2</sup>

Specifically, Frontier requests confidential treatment of the detailed reporting of outages lasting longer than 30 minutes in 2013, which includes the location, cause, duration and efforts taken to prevent further outages. This information is competitively sensitive and is not normally released to the public; release of such sensitive data could give Frontier's competitors an advantage in the markets described therein.<sup>3</sup>

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<sup>1</sup> 47 C.F.R. § 54.313(i) (2014).

<sup>2</sup> *In re: Developing a Unified Inter-carrier Compensation Regime; Establishing Just and Reasonable Rates for Local Exchange Carriers; Connect America Fund; High-Cost Universal Service Support; A National Broadband Plan for Our Future*, CC Dkt. No. 01-92, WC Dkt. Nos. 07-135, 10-90, 05-337, GN Dkt. No. 09-51, *Third Protective Order*, DA 10-1749 (rel. Aug. 30, 2012).

<sup>3</sup> Frontier notes that section 4.2 of the Commission's rules, which governs disruptions of communications service, states that reports of service disruptions are "presumed to be confidential." 47 C.F.R. § 4.2 (2013).

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**REDACTED—FOR PUBLIC INSPECTION**

Frontier also requests confidential treatment of its unfulfilled voice and broadband service requests. This information is competitively sensitive as it may provide an indication of where Frontier may target future service expansion. This information is not normally released to the public; release of such sensitive data could give Frontier’s competitors an advantage in the markets described therein.

Finally, Frontier requests confidential treatment of its broadband price offerings. While broadband price offerings may be publicly available on a targeted and localized basis, Frontier does not make available a companywide description of its pricing across all markets, which is what this report provides. This information is competitively sensitive as pricing is a key component of broadband competition and is not normally released to the public at this scale; release of such sensitive data could give Frontier’s competitors an advantage in the markets described therein.

The non-redacted submissions have been marked as confidential. Frontier requests that the documents marked as confidential be withheld from public inspection. Frontier is also filing a redacted copy of this report for public inspection.

Frontier submits today information for the following companies:

<b>State</b>	<b>Study Area Name</b>	<b>SAC</b>
ID	Frontier Communications Northwest, Inc.	472416
ID	Citizens Frontier –ID	474427
IN	Frontier of Indiana	320750
IN	Frontier North, Inc.	320772
IN	Frontier North, Inc.	320779
IN	Frontier – Thorntown	320828
IN	Frontier Midstates, Inc.	323034
NM	Navajo – NM- Frontier	494449
NC	Frontier Communications of the Carolinas Inc.	230479
NC	Frontier Communications of the Carolinas Inc.	230509
NV	Frontier Communications of the Southwest Inc.	552302
NV	Citizens Frontier –NV	554431
NV	Citizens Frontier –NV	554432
NY	Frontier – Ausable Valley	150072
NY	Frontier Communications of NY	150100
NY	Ogden Telephone	150110
NY	Frontier-Rochester	150121
NY	Frontier – Seneca Gorham	150122
NY	Frontier – Sylvan Lake	150128
NY	Citizens Frontier NY	154532
NY	Citizens Frontier NY	154533
NY	Citizens Frontier NY	154534
OR	Frontier Communications Northwest, Inc.	532416
OR	Citizens Frontier –OR	533401
TN	Citizens Frontier – Volunteer State	290580
TN	Citizens Frontier –TN	294336

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**REDACTED—FOR PUBLIC INSPECTION**

UT	Citizens Frontier –UT	504429
UT	Navajo – UT- Frontier	504449
WV	Citizens Frontier –WV	200271
WV	Citizens Frontier –WV	204338
WV	Citizens Frontier –WV	204339
WV	Frontier West Virginia Inc.	205050

Please feel free to contact me with any further questions.

Sincerely,



Michael D. Saperstein, Jr.  
Vice President, Federal Regulatory Affairs  
Frontier Communications  
(202) 223-6807

Attachment  
cc: Alex Minard

<010> Study Area Code	533401
<015> Study Area Name	CITIZENS-FRONTIER-OR
<020> Program Year	2015
<030> Contact Name: Person USAC should contact with questions about this data	Cassandra Guinness
<035> Contact Telephone Number: Number of the person identified in data line <030>	5857774557 ext.
<039> Contact Email Address: Email of the person identified in data line <030>	cassandra.guinness@ftr.com

<b>ANNUAL REPORTING FOR ALL CARRIERS</b>	<b>54.313 Completion Required</b>	<b>54.422 Completion Required</b>
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			(check box when complete)	
<100>	Service Quality Improvement Reporting	<i>(complete attached worksheet)</i>	<input checked="" type="checkbox"/>	
<200>	Outage Reporting (voice)	<i>(complete attached worksheet)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210>	<input checked="" type="checkbox"/> <-- check box if no outages to report		<input checked="" type="checkbox"/>	
<300>	Unfulfilled Service Requests (voice) <input type="text" value="0"/>		<input checked="" type="checkbox"/>	
<310>	Detail on Attempts (voice)	<i>(attach descriptive document)</i>		
<320>	Unfulfilled Service Requests (broadband) <input type="text" value=""/>		<input checked="" type="checkbox"/>	
<330>	Detail on Attempts (broadband)	<i>(attach descriptive document)</i>	<input checked="" type="checkbox"/>	
<400>	Number of Complaints per 1,000 customers (voice)			
<410>	Fixed	<input type="text" value="1.72"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420>	Mobile	<input type="text" value=""/>		
<430>	Number of Complaints per 1,000 customers (broadband)		<input checked="" type="checkbox"/>	
<440>	Fixed	<input type="text" value="0.0"/>		
<450>	Mobile	<input type="text" value="0.0"/>		
<500>	Service Quality Standards & Consumer Protection Rules Compliance		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510>	<input type="text" value="533401OR510.pdf"/>	<i>(attached descriptive document)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600>	Functionality in Emergency Situations		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610>	<input type="text" value="533401OR610.pdf"/>	<i>(attached descriptive document)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700>	Company Price Offerings (voice)		<input checked="" type="checkbox"/>	
<710>	Company Price Offerings (broadband)		<input checked="" type="checkbox"/>	
<800>	Operating Companies and Affiliates		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900>	Tribal Land Offerings (Y/N)? <input checked="" type="radio"/> <input type="radio"/>		<input checked="" type="checkbox"/>	
<1000>	Voice Services Rate Comparability		<input checked="" type="checkbox"/>	
<1010>	<input type="text" value=""/>	<i>(attach descriptive document)</i>		
<1100>	Terrestrial Backhaul (Y/N)? <input checked="" type="radio"/> <input type="radio"/>		<input type="checkbox"/>	
<1110>				
<1200>	Terms and Condition for Lifeline Customers			<input checked="" type="checkbox"/>

**Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet**

<2000>	Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers	<i>(check to indicate certification)</i>	<input checked="" type="checkbox"/>	
<2005>		<i>(complete attached worksheet)</i>	<input checked="" type="checkbox"/>	

**Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet**

<3000>		<i>(check to indicate certification)</i>		
<3005>		<i>(complete attached worksheet)</i>		

**(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	533401
<015> Study Area Name	CITIZENS-FRONTIER-OR
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Cassandra Guinness
<035> Contact Telephone Number - Number of person identified in data line <030>	5857774557 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	cassandra.guinness@ftr.com

<110> Has your company received its ETC certification from the FCC? (yes / no)

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)

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

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

Name of Attached Document

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

- <113> Maps detailing progress towards meeting plan targets
- <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.


<b>(200) Service Outage Reporting (Voice) Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<b>&lt;010&gt;</b>	Study Area Code	533401
<b>&lt;015&gt;</b>	Study Area Name	CITIZENS-FRONTIER-OR
<b>&lt;020&gt;</b>	Program Year	2015
<b>&lt;030&gt;</b>	Contact Name - Person USAC should contact regarding this data	Cassandra Guinness
<b>&lt;035&gt;</b>	Contact Telephone Number - Number of person identified in data line <030>	5857774557 ext.
<b>&lt;039&gt;</b>	Contact Email Address - Email Address of person identified in data line <030>	cassandra.guinness@ftr.com

<b>&lt;220&gt;</b>	<b>&lt;a&gt;</b>	<b>&lt;b1&gt;</b>	<b>&lt;b2&gt;</b>	<b>&lt;b3&gt;</b>	<b>&lt;b4&gt;</b>	<b>&lt;c1&gt;</b>	<b>&lt;c2&gt;</b>	<b>&lt;d&gt;</b>	<b>&lt;e&gt;</b>	<b>&lt;f&gt;</b>	<b>&lt;g&gt;</b>	<b>&lt;h&gt;</b>
	<b>NORS Reference Number</b>	<b>Outage Start Date</b>	<b>Outage Start Time</b>	<b>Outage End Date</b>	<b>Outage End Time</b>	<b>Number of Customers Affected</b>	<b>Total Number of Customers</b>	<b>911 Facilities Affected (Yes / No)</b>	<b>Service Outage Description (Check all that apply)</b>	<b>Did This Outage Affect Multiple Study Areas (Yes / No)</b>	<b>Service Outage Resolution</b>	<b>Preventative Procedures</b>



<b>(700) Price Offerings including Voice Rate Data</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	533401
<015>	Study Area Name	CITIZENS-FRONTIER-OR
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Cassandra Guinness
<035>	Contact Telephone Number - Number of person identified in data line <030>	5857774557 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	cassandra.guinness@ftr.com

<701>	Residential Local Service Charge Effective Date	1/1/2014
<702>	Single State-wide Residential Local Service Charge	

<703>	<a1>	<a2>	<a3>	<b1>	<b2>	<b3>	<b4>	<b5>	<c>
	State	Exchange (ILEC)	SAC (CETC)	Rate Type	Residential Local Service Rate	State Subscriber Line Charge	State Universal Service Fee	Mandatory Extended Area Service Charge	Total per line Rates and Fees

-- See attached worksheet

<b>(710) Broadband Price Offerings Data Collection Form</b>	FCC Form 481
	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010> Study Area Code	533401
<015> Study Area Name	CITIZENS-FRONTIER-OR
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Cassandra Guinness
<035> Contact Telephone Number - Number of person identified in data line <030>	5857774557 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	cassandra.guinness@ftr.com

<711>	<a1>	<a2>	<b1>	<b2>	<c>	<d1>	<d2>	<d3>	<d4>
	State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rate and Fees	Broadband Service - Download Speed (Mbps)	Broadband Service - Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached <i>{select }</i>

-- See attached worksheet --

<b>(800) Operating Companies</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	533401
<015>	Study Area Name	CITIZENS-FRONTIER-OR
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Cassandra Guinness
<035>	Contact Telephone Number - Number of person identified in data line <030>	5857774557 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	cassandra.guinness@ftr.com
<810>	Reporting Carrier	Citizens Telecommunications Company of Oregon
<811>	Holding Company	Frontier Communications Corporation
<812>	Operating Company	Citizens Telecommunications Company of Oregon

<813>	<a1>	<a2>	<a3>
	Affiliates	SAC	Doing Business As Company or Brand Designation

-- See attached worksheet --

**(900) Tribal Lands Reporting  
Data Collection Form**

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010> Study Area Code	533401
<015> Study Area Name	CITIZENS-FRONTIER-OR
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Cassandra Guinness
<035> Contact Telephone Number - Number of person identified in data line <030>	5857774557 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	cassandra.guinness@ftr.com

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

Cow Creek Band of the Umpqua Tribe of Indians

<920> Tribal Government Engagement Obligation

533401OR920.pdf

Name of Attached Document

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

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

Select (Yes,No, NA)
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes

<b>(1100) No Terrestrial Backhaul Reporting Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<b>&lt;010&gt;</b>	Study Area Code	533401
<b>&lt;015&gt;</b>	Study Area Name	CITIZENS-FRONTIER-OR
<b>&lt;020&gt;</b>	Program Year	2015
<b>&lt;030&gt;</b>	Contact Name - Person USAC should contact regarding this data	Cassandra Guinness
<b>&lt;035&gt;</b>	Contact Telephone Number - Number of person identified in data line <030>	5857774557 ext.
<b>&lt;039&gt;</b>	Contact Email Address - Email Address of person identified in data line <030>	cassandra.guinness@ftr.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)

<b>(1200) Terms and Condition for Lifeline Customers</b> <b>Lifeline</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	533401
<015>	Study Area Name	CITIZENS-FRONTIER-OR
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Cassandra Guinness
<035>	Contact Telephone Number - Number of person identified in data line <030>	5857774557 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	cassandra.guinness@ftr.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

533401OR1210.pdf

Name of Attached Document

<1220> Link to Public Website

HTTP // [www.frontier.com/discountprograms/lifelineprogram](http://www.frontier.com/discountprograms/lifelineprogram)

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

<1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,

<1222> Details on the number of minutes provided as part of the plan,

<1223> Additional charges for toll calls, and rates for each such plan.

**(2000) Price Cap Carrier Additional Documentation**

FCC Form 481

**Data Collection Form**

OMB Control No. 3060-0986/OMB Control No. 3060-0819

*Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers*

July 2013

<010>	Study Area Code	533401
<015>	Study Area Name	CITIZENS-FRONTIER-OR
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Cassandra Guinness
<035>	Contact Telephone Number - Number of person identified in data line <030>	5857774557 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	cassandra.guinness@ftr.com

**CHECK the boxes below to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e) the information reported on this form and in the documents attached below is accurate.**

**Incremental Connect America Phase I reporting**

- <2010> 2nd Year Certification {47 CFR § 54.313(b)(1)}
- <2011> 3rd Year Certification {47 CFR § 54.313(b)(2)}

**Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)}**

- <2012> 2013 Frozen Support Certification
- <2013> 2014 Frozen Support Certification
- <2014> 2015 Frozen Support Certification
- <2015> 2016 and future Frozen Support Certification

**Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}**

- <2016> Certification Support Used to Build Broadband

**Connect America Phase II Reporting {47 CFR § 54.313(e)}**

- <2017> 3rd year Broadband Service Certification
- <2018> 5th year Broadband Service Certification
- <2019> Interim Progress Certification
- <2020> Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

<2021> Interim Progress Community Anchor Institutions

Name of Attached Document Listing Required Information

REDACTED FOR PUBLIC INSPECTION

(3000) Rate Of Return Carrier Additional Documentation

FCC Form 481

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	533401
<015>	Study Area Name	CITIZENS-FRONTIER-OR
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Cassandra Guinness
<035>	Contact Telephone Number - Number of person identified in data line <030>	5857774557 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	cassandra.guinness@ftr.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))  
(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)

If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains

(3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications

(3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3021) Management letter issued by the independent certified public accountant that performed the company's financial audit.

If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

(3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers,

(3023) Underlying information subjected to a review by an independent certified public accountant

(3024) Underlying information subjected to an officer certification.

(3025) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3026) Attach the worksheet listing required information

Name of Attached Document Listing Required Information



<b>Certification - Reporting Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<b>&lt;010&gt;</b>	Study Area Code	533401
<b>&lt;015&gt;</b>	Study Area Name	CITIZENS-FRONTIER-OR
<b>&lt;020&gt;</b>	Program Year	2015
<b>&lt;030&gt;</b>	Contact Name - Person USAC should contact regarding this data	Cassandra Guinness
<b>&lt;035&gt;</b>	Contact Telephone Number - Number of person identified in data line <030>	5857774557 ext.
<b>&lt;039&gt;</b>	Contact Email Address - Email Address of person identified in data line <030>	cassandra.guinness@ftr.com

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

<b>Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients</b>	
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:	CITIZENS-FRONTIER-OR
Signature of Authorized Officer:	CERTIFIED ONLINE <span style="float: right;">Date 06/12/2014</span>
Printed name of Authorized Officer:	Ken Mason
Title or position of Authorized Officer:	VP, Business Operations
Telephone number of Authorized Officer:	5857775645 ext.
Study Area Code of Reporting Carrier:	533401 <span style="float: right;">Filing Due Date for this form: 06/30/2014</span>
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.	

<b>Certification - Agent / Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	533401
<015>	Study Area Name	CITIZENS-FRONTIER-OR
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Cassandra Guinness
<035>	Contact Telephone Number - Number of person identified in data line <030>	5857774557 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	cassandra.guinness@ftr.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	
<p>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.</p>	
Name of Authorized Agent:	
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:
<small>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.</small>	

**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	
<p>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.</p>	
Name of Reporting Carrier:	
Name of Authorized Agent or Employee of Agent:	
Signature of Authorized Agent or Employee of Agent:	Date:
Printed name of Authorized Agent or Employee of Agent:	
Title or position of Authorized Agent or Employee of Agent:	
Telephone number of Authorized Agent or Employee of Agent:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
<small>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.</small>	

## Attachments

FCC Form 481

Line 100 – Service Quality Improvement Reporting  
[47 CFR 54.313(a)(1)]

In the FCC's Public Notice DA 14-951, released May 1, 2014, the FCC waived the requirement for price cap ETCs to file a five-year plan.<sup>1</sup>

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<sup>1</sup> The Public Notice stated, in relevant part:

We now grant a waiver of this requirement for price cap ETCs for an additional year. Because the Bureau just finalized the Connect America Cost Model, and price cap carriers have not yet had the opportunity to make a state-level commitment for Connect America Phase II, we find that it is not in the public interest to require price cap ETCs to file new five-year plans in 2014 for the same reason as last year: they do not yet know which areas they will be serving in the future.

FCC Form 481

Line 330 - Unfulfilled Broadband Service Requests Resolution

State:

Oregon

Year:

2013

Study Area Code:

533401

Study Area Name:

Citizens  
Telecommunications  
Company Of Oregon

(A)

(B)

(C)

(D)

(E)

Date When the Request

was Considered

Unfulfilled

(mm/dd/yyyy)

Name of Exchange/  
Wire Center

Description of Service  
Request

How Service Fulfillment was Attempted/Reason  
for Unfulfillment

(If fulfilled in 2013, include date of fulfillment.)

Date of Potential  
Customer's Request  
(mm/dd/yyyy)



FCC Form 481

Line 330 - Unfulfilled Broadband Service Requests Resolution

State:

Oregon

Year:

2013

Study Area Code:

533401

Study Area Name:

Citizens  
Telecommunications  
Company Of Oregon

(A)

(B)

(C)

(D)

(E)

Date of Potential Customer's Request (mm/dd/yyyy)	Date When the Request was Considered Unfulfilled (mm/dd/yyyy)	Name of Exchange/ Wire Center	Description of Service Request	How Service Fulfillment was Attempted/Reason for Unfulfillment (If fulfilled in 2013, include date of fulfillment.)
---	--	----------------------------------	-----------------------------------	---



FCC Form 481

Line 330 - Unfulfilled Broadband Service Requests Resolution

State:

Oregon

Year:

2013

Study Area Code:

533401

Study Area Name:

Citizens  
Telecommunications  
Company Of Oregon

(A)

(B)

(C)

(D)

(E)

Date of Potential Customer's Request (mm/dd/yyyy)	Date When the Request was Considered Unfulfilled (mm/dd/yyyy)	Name of Exchange/ Wire Center	Description of Service Request	How Service Fulfillment was Attempted/Reason for Unfulfillment (If fulfilled in 2013, include date of fulfillment.)

FCC Form 481

Line 330 - Unfulfilled Broadband Service Requests Resolution

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2013

Study Area Code:

533401

Study Area Name:

Citizens  
Telecommunications  
Company Of Oregon

(A)

(B)

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(E)

Date When the Request

was Considered

Unfulfilled

(mm/dd/yyyy)

Name of Exchange/  
Wire Center

Description of Service  
Request

How Service Fulfillment was Attempted/Reason  
for Unfulfillment

(If fulfilled in 2013, include date of fulfillment.)

Date of Potential  
Customer's Request  
(mm/dd/yyyy)

Date of Potential Customer's Request (mm/dd/yyyy)	Date When the Request was Considered Unfulfilled (mm/dd/yyyy)	Name of Exchange/ Wire Center	Description of Service Request	How Service Fulfillment was Attempted/Reason for Unfulfillment (If fulfilled in 2013, include date of fulfillment.)



FCC Form 481

Line 330 - Unfulfilled Broadband Service Requests Resolution

State:

Oregon

Year:

2013

Study Area Code:

533401

Study Area Name:

Citizens  
Telecommunications  
Company Of Oregon

(A)

(B)

(C)

(D)

(E)

Date When the Request

Date of Potential  
Customer's Request  
(mm/dd/yyyy)

was Considered  
Unfulfilled  
(mm/dd/yyyy)

Name of Exchange/  
Wire Center

Description of Service  
Request

How Service Fulfillment was Attempted/Reason  
for Unfulfillment  
(If fulfilled in 2013, include date of fulfillment.)

(A)	(B)	(C)	(D)	(E)
Date of Potential Customer's Request (mm/dd/yyyy)	Date When the Request was Considered Unfulfilled (mm/dd/yyyy)	Name of Exchange/ Wire Center	Description of Service Request	How Service Fulfillment was Attempted/Reason for Unfulfillment (If fulfilled in 2013, include date of fulfillment.)



**(710) Broadband Price Offerings  
Data Collection Form**

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	533401
<015>	Study Area Name	CITIZENS-FRONTIER-OR
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Cassandra Guinness
<035>	Contact Telephone Number - Number of person identified in data line <030>	5857774557 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	cassandra.guinness@ftr.com

<711>	<a1>	<a2>	<b1>	<b2>	<c>	<d1>	<d2>	<d3>	<d4>
State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rates and Fees	Broadband Service Download Speed (Mbps)	Broadband Service - Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached {select}	
[Redacted Data]									



REDACTED FOR PUBLIC INSPECTION

**(800) Operating Companies**

**Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	533401
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<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Cassandra Guinness
<035>	Contact Telephone Number - Number of person identified in data line <030>	5857774557 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	cassandra.guinness@ftr.com
<810>	Reporting Carrier	Citizens Telecommunications Company of Oregon
<811>	Holding Company	Frontier Communications Corporation
<812>	Operating Company	Citizens Telecommunications Company of Oregon

<813>	<a1>	<a2>	<a3>
	Affiliates	SAC	Doing Business As Company or Brand Designation
	Frontier Comm. of Alabama, Inc.	250306	Frontier Communications of Alabama, LLC
	Frontier Comm. of Lamar County	250301	Frontier Communications of Lamar County, LLC
	Frontier of the South - Alabama	250318	Frontier Communications of the South, LLC
	CTC White Mountains	454426	Frontier Communications of the White Mountains
	Citizens Utilities Rural Company	452172	Frontier Citizens Utilities Rural
	Frontier Comm. of the Southwest, Inc (AZ-Contel)	452302	Frontier Communications of the Southwest Inc.
	Navajo Comm - Arizona	454449	Frontier Navajo Communications / Frontier Navajo Communications Company
	CTC California	542308	Frontier Communications of California
	CTC California (Golden St)	543402	Frontier Communications of California
	CTC California (Tuolomne)	544342	Frontier Communications of California
	Frontier Comm. of the Southwest, Inc (CA-Contel)	541863	Frontier Communications of the Southwest Inc.
	CTC California (West Coast)	542344	Frontier Communications of California
	CTC-California (Global Valley)	542315	Frontier Communications of California
	Frontier of the South - Florida	210318	Frontier Communications of the South, LLC
	Frontier Comm. of Fairmount	220362	Frontier Communications of Fairmount LLC
	Frontier Comm. of Georgia, Inc.	220387	Frontier Communications of Georgia LLC
	Frontier Comm. of Iowa, Inc.	351127	Frontier Communications of Iowa, LLC
	CTC Idaho	474427	Frontier Communications of Idaho
	Frontier Comm. Northwest, Inc (ID-GTE)	472416	Frontier Communications Northwest Inc.
	CTC Illinois	341183	Frontier Citizens Communications of Illinois
	Frontier Comm. - Schuyler, Inc.	341079	Frontier Communications - Schuyler, Inc.
	Frontier Comm.- Midland, Inc.	341055	Frontier Communications - Midland, Inc.
	Frontier Comm. of Illinois, Inc.	341038	Frontier Communications of Illinois, Inc.

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(800) Operating Companies

Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	cassandra.guinness@ftr.com
<810>	Reporting Carrier	Citizens Telecommunications Company of Oregon
<811>	Holding Company	Frontier Communications Corporation
<812>	Operating Company	Citizens Telecommunications Company of Oregon

<813>	<a1>	<a2>	<a3>
	Affiliates	SAC	Doing Business As Company or Brand Designation
	Frontier Comm. of Lakeside, Inc.	341011	Frontier Communications of Lakeside, Inc.
	Frontier Comm. of Mt. Pulaski	341061	Frontier Communications of Mt. Pulaski, Inc.
	Frontier Comm. of Orion, Inc.	341067	Frontier Communications of Orion, Inc.
	Frontier Comm. of Prairie, Inc.	341073	Frontier Communications - Prairie, Inc.
	Frontier Comm. of the Carolinas, Inc (IL-Alltel)	343035	Frontier Communications of the Carolinas LLC
	Frontier Comm.-DePue, Inc.	340998	Frontier Communications of DePue, Inc.
	Frontier North, Inc (IL-GTE)	341015	Frontier North Inc.
	Frontier North, Inc. (IL-Contel)	341036	Frontier North Inc.
	Frontier Comm. of Indiana, Inc.	320750	Frontier Communications of Indiana LLC
	Frontier Comm. of Thorntown, Inc.	320828	Frontier Communications of Thorntown LLC
	Frontier Midstates, Inc (IN-Alltel)	323034	Frontier Midstates Inc.
	Frontier North, Inc (IN-Contel)	320779	Frontier North Inc.
	Frontier North, Inc (IN-GTE)	320772	Frontier North Inc.
	Frontier Comm. of Michigan, Inc.	310682	Frontier Communications of Michigan, Inc.
	Frontier Midstates, Inc (MI-Alltel)	313033	Frontier Midstates Inc.
	Frontier North, Inc (MI-GTE)	310695	Frontier North Inc.
	CTC Minnesota-Lakes	361123	Frontier Citizens Communications of Minnesota
	CTC Minnesota-South	367123	Frontier Citizens Communications of Minnesota
	Frontier Comm. of Minnesota, Inc.	361367	Frontier Communications of Minnesota, Inc.
	Frontier Comm. of Mississippi	280460	Frontier Communications of Mississippi LLC
	CTC Montana	484322	Frontier Communications of Montana
	Frontier Comm. of the Carolinas, Inc (NC-Contel)	230509	Frontier Communications of the Carolinas LLC
	Frontier Comm. of the Carolinas, Inc (NC-GTE)	230479	Frontier Communications of the Carolinas LLC

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(800) Operating Companies

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<810>	Reporting Carrier	Citizens Telecommunications Company of Oregon
<811>	Holding Company	Frontier Communications Corporation
<812>	Operating Company	Citizens Telecommunications Company of Oregon

<813>	<a1>	<a2>	<a3>
	Affiliates	SAC	Doing Business As Company or Brand Designation
	CTC Nebraska	371128	Frontier Communications of Nebraska
	Navajo Comm - New Mexico	494449	Frontier Navajo Communications / Frontier Navajo Communications Company
	CTC of Nevada - North	554431	Frontier Communications of Nevada
	CTC of Nevada - South	554432	Frontier Communications of Nevada
	Frontier Comm. of the Southwest, Inc (NV-Contel)	552302	Frontier Communications of the Southwest Inc.
	CTC of NY - Red Hook	154533	Frontier Communications of New York
	CTC of NY - Upstate	154532	Frontier Communications of New York
	CTC of NY - Western Counties	154534	Frontier Communications of New York
	CTC Ogden, Inc.	150110	Frontier Ogden Telephone Company
	Frontier Comm. of New York	150100	Frontier Communications of New York, Inc.
	Frontier Comm. of Sylvan Lake	150128	Frontier Communications of Sylvan Lake, Inc.
	Frontier Comm.-Ausable Valley	150072	Frontier Communications of Ausable Valley, Inc.
	Frontier Comm.-Seneca Gorham	150122	Frontier Communications of Seneca-Gorham, Inc.
	Frontier Telephone of Rochester	150121	Frontier Telephone of Rochester, Inc.
	Frontier North, Inc (OH-GTE)	300615	Frontier North Inc.
	Frontier of Michigan, Inc. - Ohio	300682	Frontier Communications of Michigan, Inc.
	CTC Oregon	533401	Frontier Communications of Oregon
	Frontier Comm. Northwest, Inc (OR-GTE)	532416	Frontier Communications Northwest Inc.
	Commonwealth of PA	170161	Frontier Communications Commonwealth Telephone Company
	Frontier Comm. of Breezewood	170149	Frontier Communications of Breezewood, LLC
	Frontier Comm. of Canton, Inc.	170152	Frontier Communications of Canton, LLC
	Frontier Comm. of Oswayo River	170194	Frontier Communications of Oswayo River LLC
	Frontier Comm. of Pennsylvania	170168	Frontier Communications of Pennsylvania, LLC

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<b>(800) Operating Companies</b>	FCC Form 481
<b>Data Collection Form</b>	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

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<812>	Operating Company	Citizens Telecommunications Company of Oregon

<813>	<a1>	<a2>	<a3>
	Affiliates	SAC	Doing Business As Company or Brand Designation
	Frontier Comm.of Lakewood, Inc	170178	Frontier Communications of Lakewood, LLC
	Frontier Comm. of the Carolinas, Inc (SC-Contel)	240526	Frontier Communications of the Carolinas LLC
	Frontier Comm. of the Carolinas, Inc (SC-GTE)	240479	Frontier Communications of the Carolinas LLC
	CTC Tennessee	294336	Frontier Communications of Tennessee
	CTC Volunteer State	290580	Frontier Communications of the Volunteer State
	CTC Utah	504429	Frontier Communications of Utah
	Navajo Comm - Utah	504449	Frontier Navajo Communications / Frontier Navajo Communications Company
	Frontier Comm. Northwest, Inc (WA-Contel)	522449	Frontier Communications Northwest Inc.
	Frontier Comm. Northwest, Inc (WA-GTE)	522416	Frontier Communications Northwest Inc.
	Frontier Comm of St. Croix	330944	Frontier Communications - St. Croix LLC
	Frontier Comm. of Mondovi, Inc.	330912	Frontier Communications of Mondovi LLC
	Frontier Comm. of Viroqua, Inc.	330967	Frontier Communications of Viroqua LLC
	Frontier Comm. of Wisconsin, Inc.	330964	Frontier Communications of Wisconsin LLC
	Frontier North, Inc (WI-GTE)	330886	Frontier North Inc.
	Rhineland Telco - Crandon	330870	Frontier Rhineland Telephone Company
	Rhineland Telco - Headwaters	330891	Frontier Rhineland Telephone Company
	Rhineland Telco - Rhineland	330940	Frontier Rhineland Telephone Company
	Rhineland Telco - Rib Lake	330941	Rib Lake Telecom, Inc.
	CTC West Virginia - Bluefield	204339	Frontier Communications of West Virginia
	CTC West Virginia - Mountain St.	200271	Frontier Communications of West Virginia
	CTC West Virginia - St. Marys	204338	Frontier Communications of West Virginia
	Frontier West Virginia, Inc	205050	Frontier West Virginia Inc.



Line 920 – Tribal Government Engagement Obligation

During the months of May through July of 2013, the company contacted the tribal leader of each Tribal Land identified on line 910 by mailing, via U.S. Postal Service Certified Mail, an Annual Tribal Government Engagement letter, of which an example is included as Attachment "A". The letter included a copy of the FCC's Public Notice DA 12-1165, released July, 19, 2012, which provided guidance on the Tribal Engagement Obligation. The letter also included an informational bulletin describing the Federal Tribal Lifeline and Tribal Linkup support programs.

In follow up to the letter, the company's local general manager or representative responsible for making decisions contacted, or attempted to contact, each tribal leader, either by telephone or in person, to initiate ongoing discussions to address the Tribal Engagement Obligations.

**Attachment "A"**



Mailing: 276 La Clair  
Coos Bay, OR 97420

May 22, 2013

Mr. Dan Courtney, Chairman  
Cow Creek Band of Umpqua Tribe of Indians  
2371 NE Stephens, Suite 100  
Roseburg, Oregon 97470

RE: Annual Tribal Government Engagement and Lifeline Availability

Dear Chairman Courtney:

In November 2011 the Federal Communications Commission (FCC) issued its *USF/ICC Transformation Order* reforming the federal Universal Service Fund (USF) and intercarrier compensation system.<sup>1</sup> As part of the *USF/ICC Transformation Order*, the FCC adopted a Tribal government engagement requirement for all eligible telecommunications carriers that are currently serving or are seeking to serve tribal lands.<sup>2</sup> The Tribal government engagement requirement is intended to benefit Tribal government leaders, communication service providers and consumers living on Tribal lands, ultimately providing greater connectivity to 21<sup>st</sup> century economic opportunities, education, health care and public safety.

Enclosed is a copy of the Public Notice released July 19, 2012, by the FCC's Office of Native Affairs and Policy, which provides further guidance on the Tribal government engagement obligations.

At your earliest convenience, I would appreciate hearing from you in order to schedule a meeting and begin discussing these important issues which are vitally important to the successful deployment and provision of communication services on Tribal lands.

I have also enclosed an informational bulletin which describes the Federal Tribal Lifeline and Tribal Linkup support programs available to eligible residents of Tribal lands. I hope you find this information helpful and will share it with your tribal members and constituents.

Sincerely,

A handwritten signature in black ink that reads "W. Burge III". The signature is fluid and cursive, with a large loop at the end.

Willard Burge, III  
General Manager

Telephone: 541-269-3474  
Email: [Willard.x.burge@ftr.com](mailto:Willard.x.burge@ftr.com)

Attachments

<sup>1</sup> See *Connect America Fund, et al.*, W.C. Docket. No. 10-90 *et al.*, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd. 17663, FCC 11-161 (rel. November. 18, 2011).

<sup>2</sup> See *id.*, at para. 637.



# PUBLIC NOTICE

Federal Communications Commission  
 445 12<sup>th</sup> St., S.W.  
 Washington, D.C. 20554

News Media Information 202 / 418-0500  
 Internet: <http://www.fcc.gov>  
 TTY: 1-888-835-5322

DA 12-1165  
 Released: July 19, 2012

**OFFICE OF NATIVE AFFAIRS AND POLICY,  
 WIRELESS TELECOMMUNICATIONS BUREAU, AND  
 WIRELINE COMPETITION BUREAU ISSUE FURTHER GUIDANCE ON  
 TRIBAL GOVERNMENT ENGAGEMENT OBLIGATION PROVISIONS OF THE  
 CONNECT AMERICA FUND**

WC Docket Nos. 10-90, 07-135, 05-337, 03-109  
 CC Docket Nos. 01-92, 96-45  
 WT Docket No. 10-208  
 GN Docket No. 09-51

## I. INTRODUCTION AND SUMMARY

1. By this Public Notice, the Federal Communications Commission's (FCC or Commission) Office of Native Affairs and Policy (ONAP), in coordination with the Wireless Telecommunications and Wireline Competition Bureaus (the Bureaus), provides further guidance on the Tribal engagement obligation adopted in the *USF/ICC Transformation Order*.<sup>1</sup> This document is intended to facilitate the required discussions between Tribal government officials and communications providers either currently providing or seeking to provide service on Tribal lands with the use of Universal Service Fund (USF) support.<sup>2</sup>

2. The broad goal of the guidance provided today, and future efforts to establish best practices, is to ensure the effective exchange of information that will lead to a common understanding between Tribal governments and communications providers receiving USF support, on the deployment and improvement of communications services on Tribal lands. The Tribal engagement obligation is intended to benefit Tribal government leaders, service providers, and consumers living on Tribal lands, ultimately providing greater connectivity to 21<sup>st</sup> century economic opportunities, education, health care, and public safety. This obligation is related to the very essence of universal service – facilitating and supporting connectivity to and from the most remote areas of our nation inures to the benefit of all. Requiring Tribal engagement is intended to begin and, in some cases, to strengthen, the dialogue between communications providers and Tribal governments. We anticipate that genuine dialogue and common understandings will ultimately lead to improvement of communications services on Tribal lands.

<sup>1</sup> See *Connect America Fund*, WC Docket No. 10-90 *et al.*, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC 17663 at 17868-69, para. 637 (2011) (*USF/ICC Transformation Order*); *pets. for review pending sub nom. In re: FCC 11-161*, No. 11-9900 (10th Cir. filed Dec. 18, 2011).

<sup>2</sup> See *id.* In the context of the *USF/ICC Transformation Order*, "Tribal lands" is defined as "any federally recognized Indian tribe's reservation, pueblo or colony, including former reservations in Oklahoma, Alaska Native regions established pursuant to the Alaska Native Claims Settlements [sic] Act (85 Stat. 688), and Indian Allotments, see 47 C.F.R. § 54.400(e), as well as Hawaiian Home Lands—areas held in trust for native Hawaiians by the state of Hawaii, pursuant to the Hawaiian Homes Commission Act, 1920, Act July 9, 1921, 42 Stat. 108, *et seq.*, as amended." *Id.* at para. 125, n.197.

## Federal Communications Commission

DA 12-1165

3. Good guidance, by definition, must include assistance on how to undertake an endeavor with an aim towards success. Any attempt at actual and meaningful dialogue must be predicated on the genuineness of the intent on both sides. This engagement cannot be viewed as simply another “check the box” requirement by either party. In many places, we expect that there are good and productive relationships between communications providers and Tribal Nations. To the extent that there might be existing differences, however, the parties should put aside those differences for the purposes of this engagement. This engagement process should not be approached as an adversarial undertaking. Instead, Tribal governments and carriers should take advantage of the engagement to improve communications and foster a greater common understanding of the factors necessary to deploy and sustain services on Tribal lands, as well as an honest dialogue to learn from one another what factors would lead to success in those endeavors. In all cases, a high degree of receptivity and responsiveness is necessary to achieve meaningful dialogue, as well as confidence in the reliability of information exchanged. Candid and sincere dialogue on both sides will minimize the possibility that unreasonable expectations by either party will derail common understandings and genuine solutions.

4. Creating a substantive, meaningful dialogue is an iterative process, one which, in certain regions, is at its earliest stages of development. In a similar sense, the further guidance contained in this Public Notice represents the first step in the Commission’s implementation of the Tribal engagement obligation. We recognize that priorities and plans of individual Tribal governments and individual service providers can vary greatly, as do the existing relationships between Tribal governments and carriers currently serving Tribal lands. Therefore, there is no one size fits all guidance that can be provided that will be universally applicable. As a result, the guidance provided herein is somewhat general in nature at this stage, but we anticipate that our guidance, as well as the development of best practices, will evolve over time based on initial implementation experiences and the feedback of both Tribal governments and communications providers.

5. ONAP, in coordination with the Bureaus, will track and monitor this feedback and will develop further guidance in the form of best practices based on actual experiences.<sup>3</sup> In an effort to further facilitate engagement efforts at this initial stage, ONAP will employ training and industry meeting opportunities, as well as its coordination events with Tribal Nations. These efforts will include, for example, working with national and regional communications industry associations and national and regional inter-Tribal government associations and organizations.<sup>4</sup> ONAP will focus particular efforts -- for example, by identifying commonalities, increasing efficiencies, building upon current working relationships, and engaging all regional stakeholders, as appropriate -- to foster engagement in states and regions in which Tribes and providers are particularly remote and in which Tribes are particularly numerous.<sup>5</sup> ONAP, in coordination with the Bureaus, will continue to serve as a resource for Tribal governments and communications providers and is always available for individually tailored assistance.

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<sup>3</sup> See *id.* at para. 637, n.1054 (directing ONAP, in coordination with the Bureaus, to develop best practices).

<sup>4</sup> See Letter from the Hon. Mark Begich, United States Senator, State of Alaska; the Hon. Lisa Murkowski, United States Senator, State of Alaska; and the Hon. Don Young, United States Congressman, State of Alaska, to the Hon. Julius Genachowski, Chairman, FCC, dated Feb. 22, 2012 (“[W]e request that you work with the tribal groups, carriers and the State of Alaska to clarify the tribal consultation requirements included in the reform order”). See also Letter of Becky Hultberg, Commissioner, Department of Administration, State of Alaska, to the Hon. Julius Genachowski, Chairman, FCC, dated February 17, 2012.

<sup>5</sup> For example, there are 229 federally recognized Tribes in Alaska, 108 in California, 38 in Oklahoma, 23 in New Mexico, and 21 in Arizona. See Federal Register Notice – Indian Entities Recognized and Eligible to Receive Services from the United States Bureau of Indian Affairs, 75 Fed. Reg. 60,810 (Oct. 1, 2010). See also Supplemental Federal Register Notice – Indian Entities 1 Page Recognized and Eligible to Receive Services from the United State Bureau of Indian Affairs, 75 Fed. Reg. 66,124 (Oct. 27, 2010).

## Federal Communications Commission

DA 12-1165

## II. BACKGROUND

6. In the *USF/ICC Transformation Order*, the Commission adopted a Tribal engagement requirement for all eligible telecommunications carriers (ETCs) either currently serving or seeking to serve Tribal lands.<sup>6</sup> The Commission agreed with commenters that engagement between Tribal governments and communications providers is vitally important to the successful deployment of and provision of service on Tribal lands.<sup>7</sup>

7. The Commission therefore required, at a minimum, that ETCs demonstrate on an annual basis that they have meaningfully engaged with Tribal governments in their universal service supported areas.<sup>8</sup> At a minimum, the *USF/ICC Order* stated that such discussions must include: (1) a needs assessment and deployment planning with a focus on Tribal community anchor institutions; (2) feasibility and sustainability planning; (3) marketing services in a culturally sensitive manner; (4) rights of way processes, land use permitting, facilities siting, environmental and cultural preservation review processes; and (5) compliance with Tribal business and licensing requirements.<sup>9</sup> Failure to satisfy the Tribal engagement obligation will subject ETCs to financial consequences, including potential reduction in universal service support should they fail to fulfill their engagement obligations.<sup>10</sup>

8. In requiring Tribal engagement, the Commission did not intend to supplant its own ongoing obligation to consult with Tribes on a government-to-government basis, but instead recognized the important role that all parties play in expediting communications service to Tribal lands throughout the nation, including in Alaska and Hawaii.<sup>11</sup> ETCs will be required to submit to the Commission and appropriate Tribal government officials an annual certification and summary of their compliance with the Tribal government engagement obligation as part of the new Connect America Fund reporting requirements.<sup>12</sup> The Commission defined appropriate Tribal government officials as elected or duly authorized government officials of federally recognized American Indian Tribes and Alaska Native Villages.<sup>13</sup> For Hawaiian Home Lands, this engagement must occur with the State of Hawaii Department of Hawaiian Home Lands and the Office of Hawaiian Affairs.<sup>14</sup> The Commission delegated to ONAP, in coordination with the Bureaus, the authority to develop specific procedures regarding the Tribal

<sup>6</sup> See *USF/ICC Transformation Order*, 26 FCC Rcd at 17868-69, para. 637.

<sup>7</sup> *Id.* Mobility Fund and Tribal Mobility Fund Phase I winning bidders will be required to comply with this Tribal engagement obligation at the long-form application stage, in annual reports, and prior to any disbursement of support. *Id.* at para. 489. We note, however, that any such engagement must be done consistent with our auction rules prohibiting certain communications during the competitive bidding process. *Id.* at para. 810. In the *Further Notice of Proposed Rulemaking*, the Commission proposed to apply the same Tribal engagement obligation to Phase II of the general and Tribal Mobility Funds and sought comment on that proposal. *Id.* at para. 1166.

<sup>8</sup> *Id.* at para. 637. See also 47 C.F.R. §§ 54.313(a)(9), 54.1004(d), 54.1009.

<sup>9</sup> *Id.*

<sup>10</sup> See *USF/ICC Transformation Order*, 26 FCC Rcd at 17868-69, para. 637.

<sup>11</sup> *Id.*

<sup>12</sup> *Id.* See also *id.* at para. 575 (“Under this uniform framework, ETCs will provide annual reports and certifications regarding specific aspects of their compliance with public interest obligations to the Commission, USAC [the Universal Service Administrative Company], and the relevant state commission, relevant authority in a U.S. Territory, or Tribal government, as appropriate by April 1 of each year.”) See generally *id.* at paras. 576-606 (articulating specific reporting requirements). See also *Connect America Fund*, WC Docket No. 10-90 *et al.*, Order, 27 FCC Rcd 2142 at 2144-47, paras. 4-14 (2012) (*USF/ICC Clarification Order*) (revising and clarifying certain reporting obligations for recipients of Connect America Fund support).

<sup>13</sup> *USF/ICC Transformation Order*, 26 FCC Rcd at 17869, para. 637, n.1053.

<sup>14</sup> *Id.*

## Federal Communications Commission

DA 12-1165

engagement process, as necessary.<sup>15</sup> The Commission also directed ONAP, in coordination with the Bureaus, to develop best practices regarding the Tribal engagement process to help facilitate these discussions.<sup>16</sup>

### III. FURTHER GUIDANCE ON THE TRIBAL GOVERNMENT ENGAGEMENT OBLIGATION

#### A. Overview/General Guidance

9. As stated above, the purpose of this guidance is to ensure the effective exchange of information between Tribal governments and communications providers concerning the deployment and improvement of communications services on Tribal lands throughout the nation, including in Alaska and Hawaii. This exchange of information should foster new opportunities for genuine dialogue that could achieve an alignment of interests and goals. Between certain carriers and Tribal governments, this will be an opportunity for introduction and dialogue in the first instance. In other parts of the country, this will be an opportunity for a new depth of dialogue and more meaningful interaction. An important goal of this guidance is the achievement of a level of engagement between principals on both sides that represents collaborative discussions and actual live conversation.<sup>17</sup> We encourage stakeholders to go beyond merely perfunctory exchanges of basic documents, simplistic sales or marketing presentations, or one-dimensional lists of demands.

10. It is imperative that this dialogue be undertaken at a level within communications providers and Tribal governments that is commensurate with this important engagement requirement. The discourse should be between decision-makers on both sides. While it may be necessary to include administrative staff on both sides to administer and maintain the continuity of relations, this engagement cannot be merely between sales and marketing individuals on one side and administrative staff or advisors on the other. The perspectives on needs, expectations, priorities, and abilities that would formulate meaningful exchange often can come only from those with the requisite authority to make decisions.

11. On the Tribal government side, there are certain actions that should be taken to best prepare for this valuable engagement. It is important for Tribal leaders to recognize and act upon this opportunity to become organized, maintain continuity, and provide for certainty in conveying their communications needs and priorities. The Commission has long recognized the right of sovereign Tribal governments "to set their own communications priorities and goals for the welfare of their membership."<sup>18</sup> This is a critical time for Tribal Nations to update and make comprehensive their communications priorities and goals. Tribal governments should consider all community needs that would be supported by communications services. These might include, but are not limited to, anchor institutions, economic development, education, healthcare, and public safety. Each Tribal Nation has unique elements to its communications needs and priorities, but effectively articulating those needs is a critical first step in addressing them.

12. As Tribal government administrations change and develop, this is an important opportunity to demonstrate, both to communications providers and to the Commission, their continuity in communications priorities and goals. Certain Tribal governments have created their own governmental

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<sup>15</sup> *Id.* Although our focus here is on providing guidance, the Commission thus will consider the need for further guidance, or to clarify the existing rules regarding Tribal engagement or pursue new rules with specific procedures, if warranted in the future based on actual experiences and outcomes resulting from this guidance.

<sup>16</sup> *Id.* at n.1054.

<sup>17</sup> For example, engagement may occur when necessary by phone or video conference where extreme weather conditions and/or extreme remoteness are present.

<sup>18</sup> Statement of Policy on Establishing a Government-to-Government Relationship with Indian Tribes, 16 FCC Rcd 4078, 4080-81 (2000) (*Tribal Policy Statement*).



## Federal Communications Commission

DA 12-1165

offices and commissions to interact with the FCC and communications providers. Others have designated key members of their Tribal Councils to lead their communications prerogatives for their governments, in effect creating communications committees on their Councils. Other Tribes have yet to organize their governmental or administrative systems with respect to communications services. This engagement obligation necessitates a level of organization within the Tribal government that can convey both a high degree of certainty in the communications priorities of the Tribal Nation and maintain the continuity of those priorities to the greatest extent possible in a governmental environment that, by definition, changes over time. Updating Tribal communications priorities and goals, and ensuring the establishment of effective organizational structures concerning communications issues, are important first steps. However, ETCs must begin the Tribal engagement process this year to be able to report on meaningful engagement by July 1, 2013.<sup>19</sup> Therefore, Tribal governments may need to take interim measures in the short term as they consider establishing new or modified communications goals and priorities.

13. Tribal Nations also should immediately begin preparations to receive, record, and process this engagement dialogue and any related correspondence. Specific efforts should be made to chronicle details of engagement dialogue sessions. Recordkeeping should be established for documentation of the initial contact, any follow-up communications, and the resulting annual certification documentation. Records should include, for example, a summary of all verbal interactions as well as copies of all electronic and hard copy communications.<sup>20</sup>

14. Similarly, communications providers should take immediate steps to prepare for and initiate engagement with the Tribal governments whose lands they serve. Certifications articulating the steps taken to comply with the annual Tribal engagement obligation in 2012 are due on July 1, 2013 and each year thereafter.<sup>21</sup> That is, the Tribal engagement obligation must be fulfilled by the end of each calendar year. Communications providers should, for example, take immediate steps to establish a lead and/or a team within their companies and to identify the appropriate Tribal government leaders with whom they will initiate the engagement process. The National Congress of American Indians (NCAI)<sup>22</sup> maintains a routinely updated and comprehensive directory of American Indian Tribal and Alaska Native Village government leaders, addresses, and telephone numbers. The NCAI Tribal directory can be sorted by geographical area and can be found at <http://www.ncai.org/tribal-directory>.<sup>23</sup> Where needed, ONAP also will serve as a resource for communications providers and Tribal governments.

15. In addition, communications providers should retain copies of all communications with Tribal leaders they would need in order to demonstrate compliance with their annual certification requirement. In the event that a Tribal government does not respond to repeated efforts to engage, the provider should document all attempts at engagement and certify to that effect. As with the entire engagement process, reasonableness should prevail. As a general matter, we expect that a provider would not be penalized for a failure to respond on the part of a Tribal Nation, if the provider can demonstrate repeated good faith efforts to meaningfully engage with the Tribal government.

<sup>19</sup> See *Connect America Fund*, WC Docket No. 10-90 *et al.*, Third Order on Reconsideration, FCC 12-52 at para. 10 (rel. May 14, 2012) (*Third Reconsideration Order*) (changing the filing deadline from April 1 to July 1).

<sup>20</sup> For example, all ETCs receiving high-cost are now subject to a 10-year document retention requirement. See *USF/ICC Transformation Order*, 26 FCC Rcd at 17864, para. 620. See also *Third Reconsideration Order*, FCC 12-52 at para. 14.

<sup>21</sup> See *Third Reconsideration Order*, FCC 12-52 at para. 10. See also 47 C.F.R. §§ 54.313, 54.1009..

<sup>22</sup> NCAI is the nation's oldest, largest, and most representative inter-Tribal government and communities organization, representing American Indian Tribes and Alaska Native Villages.

<sup>23</sup> For a listing of all federally recognized American Indian Tribes and Alaska Native Villages, see [www.bia.gov/cs/groups/xofa/documents/document/idc012038.pdf](http://www.bia.gov/cs/groups/xofa/documents/document/idc012038.pdf). ONAP, in coordination with the Bureaus, will endeavor to provide additional resources to Tribal governments and carriers to help facilitate this engagement, including the possibility of using the Commission's website as a repository of information.

## Federal Communications Commission

DA 12-1165

**B. Needs Assessment and Deployment Planning**

16. Tribal governments play a vital role in identifying and serving the needs and interests of their local communities, often in remote, insular, cyclically impoverished communities with a historic lack of critical infrastructure. Tribal government leaders are intimately acquainted with their members' needs and have valuable insight into how to meet them. "Tribal-centric" business models – those that actively engage the Tribe, its core community institutions, and members in deployment and adoption planning – have a greater chance of establishing sustainable services on Tribal lands.<sup>24</sup> Communications providers also have experience and a valuable perspective on the challenges, economics, and other realities of providing service to remote, low-income, and underserved regions of the country, including certain Tribal lands.

17. The Tribal engagement obligation provides Tribal governments and communications providers alike with a new opportunity – the opportunity to have a genuine conversation about communications needs and deployment planning on Tribal lands. When telephone service was originally deployed, there was no such obligation and, as a result, in many instances, Tribal needs and carrier deployment efforts were not aligned. The Tribal engagement obligation affords both Tribal governments and communications providers the opportunity to move forward with a shared vision. This will only occur, however, if Tribal governments and communications providers alike take advantage of this historic opportunity to improve the communications landscape on Tribal lands.

18. To that end, Tribal governments should come to the table with a serious, well-thought out assessment of the Tribes' communications needs. Issues that Tribal governments should consider include, for example, the Tribe's communications goals, needs, and priorities, as well as what the Tribe intends to do with communications services (e.g., provide connectivity to those living on Tribal lands, encourage economic opportunity). Tribal governments should also assess what core community or anchor institutions are central to deployment, and what in the nature and operations of these institutions is relevant to the need for communications services. In addition, Tribal governments should consider whether there are economic factors and possibly Tribally-driven opportunities that will assist in making the business case for deployment on Tribal lands, as well as opportunities where Tribal governments and communications providers can partner. In analyzing and discussing communications goals, needs, and priorities, Tribal governments should note that recipients of Connect America Fund (CAF) support, including the Mobility Fund, are subject to public interest obligations, as established in the *USF/ICC Transformation Order*.<sup>25</sup>

19. Similarly, communications providers should come to the table ready to articulate their deployment priorities, the process by which they arrived at these priorities, and their initial plans for deployment on Tribal lands. Issues that communications providers should be prepared to discuss include, for example, the services they currently deploy, and what services they intend to deploy, on Tribal lands. Providers should also be prepared to discuss their timelines for the provision of services not currently available on Tribal lands, as well as their priorities in terms of service and the factors that led them to prioritize deployment to particular areas. Communications providers should also identify any opportunities they envision to partner with Tribal governments.

**C. Feasibility and Sustainability Planning**

20. Feasibility and sustainability planning for communications services on Tribal lands presents issues of concern for both Tribal governments and communications providers. Tribal governments generally want services rapidly deployed for their members to support the economic, educational, public safety, and health care opportunities that communications services afford. Communications providers

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<sup>24</sup> See *Improving Communications Services for Native Nations*, CG Docket No. 11-41, Notice of Inquiry, 26 FCC Rcd 2672, 2679-80, para. 12 (2011) (*Native Nations NOI*).

<sup>25</sup> See *USF/ICC Transformation Order*, 26 FCC Rcd at 17691-17709, paras. 74-114.

## Federal Communications Commission

DA 12-1165

generally want business models that will be practical in terms of build out, and viable in terms of revenue flow and quality of service. While some commonalities likely exist, we believe there are many differences from one provider to another and from one Tribal government to another. The Tribal engagement obligation affords both parties the opportunity to share specific perspectives and information and to begin charting a path forward to address feasibility and sustainability in coordination with one another.

21. Tribal lands nationwide face some of the greatest challenges to the feasibility and sustainability of a 21<sup>st</sup> century communications infrastructure, including rugged and remote terrain and often endemic levels of poverty. Therefore, communications build out plans based purely on population density or proximity to other robust networks can face major cost benefit analysis challenges. Tribal government leaders, who are largely responsible for managing a wide array of government services and economic opportunities for their communities, are uniquely situated to advise communications providers of the specific challenges associated with deploying and sustaining a communications network on their lands. The Tribal engagement obligation will facilitate discussion between Tribal government leaders and communications providers, affording providers an important opportunity to draw upon the knowledge gained to inform and coordinate their feasibility and sustainability planning.

22. Tribal Nations should be prepared to discuss any additional resources they may bring to bear in feasibility and sustainability planning for communications services, because many federal grant or loan programs provide direct access to, or particular standing for, Tribal Nations and their entities. That is, there are federal government programs that support infrastructure deployment and support the economic, health, safety, and welfare missions in Native communities—the very same priorities for the deployment of robust communications networks on Tribal lands. For example, Tribes may be considering business ventures that would benefit from coordination on communications planning at the outset. Together, providers and Tribal Nations have the opportunity to discuss how to coordinate in planning, providing, and meeting the expenses for communications services on Tribal lands.

23. When addressing the issues of sustainability on Tribal lands, one must also calibrate expectations and develop an awareness of the unique nature of Tribal communities. Issues such as cyclical poverty, remoteness, and deployment priorities all inform the potential sustainability and ultimate profitability of a particular communications model on Tribal lands. That is, it can take a longer period of time to develop a sustainable enterprise on many Tribal lands. Increased coordination between Tribal governments and communications providers on specific elements of feasibility will heighten the chances of ultimate sustainability for communications business models on Tribal lands.

#### **D. Marketing Services in a Culturally Sensitive Manner**

24. As noted above, for the purposes of the USF/ICC proceeding and, therefore, the Tribal engagement obligation, Tribal lands are comprised of the lands of the approximately 566 federally recognized American Indian Tribes and Alaska Native Villages, as well as Hawaiian Home Lands.<sup>26</sup> Tribal lands represent a rich and diverse array of cultural heritage, history, practices, and pride. Outside the context of Tribally owned and operated providers, however, seldom have these cultural factors been fully considered in the marketing and deployment of communications services on Tribal lands. The Tribal engagement obligation provides Tribal governments and communications providers with the opportunity to discuss and explore ways in which they can coordinate or partner to ensure that services are marketed in a manner that will relate directly to the community, resonate with consumers, and stimulate increased adoption of services on Tribal lands.

25. Issues that Tribal governments and communications providers may wish to discuss include the tailoring of service offerings to the community through, for example, the feasibility of a local presence in the community. For example, locating a retail presence within a Tribal community and employing

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<sup>26</sup> See *supra* n.2.

## Federal Communications Commission

DA 12-1165

members of that community may increase awareness of and sensitivity to local cultural and communications needs. Providers and Tribal governments also may wish to discuss whether developing materials, separately or jointly, specific to the Tribal community would be beneficial to either the provider or consumers on Tribal lands. In addition, providers and Tribal governments also may wish to discuss what other elements of their respective organizations may need to be engaged. For Tribal governments, this may mean administrative planning, community service, and other governmental offices. For providers, this may mean customer service, technical assistance, and commercial business divisions. Through a heightened mutual understanding of one another's needs, we anticipate that Tribal governments and communications providers may discover opportunities for working together that will yield benefits to all. Studies indicate that these efforts present genuine opportunities for success, because where Native Nations and their community members have access to broadband, their rates of Internet use are on par with, if not higher than, national averages.<sup>27</sup>

**E. Rights of Way and Other Permitting and Review Processes**

26. There are numerous regulatory processes with which service providers must comply in order to provide communications services on Tribal lands, including rights of way, land use permitting, facilities siting, and environmental and cultural review processes.<sup>28</sup> Certain of these processes involve other federal agencies, such as the Department of Interior's Bureau of Indian Affairs (BIA), and failure to comply with these processes may result in a finding of trespass. Given the widely varying circumstances on different Tribal lands, a one size fits all approach is not appropriate here. Instead, in the context of the Tribal engagement obligation, the common goal for Tribal governments and communications providers should be one of greater mutual understanding about the relevant rights of way and other permitting and review processes on Tribal lands and a plan for informing communications providers of procedures in a helpful and instructive manner, designed to bring companies into compliance, where applicable.

27. To that end, Tribal governments and communications providers should come to the table prepared to discuss the relevant rights of way and other permitting and review processes, as well as the challenges associated with these processes. For example, with respect to the BIA's appraisal process for rights of way, dialogue that prioritizes early notification might expedite Tribal governments' consultations with BIA and consent.<sup>29</sup> Tribal governments should have a comprehensive list of all processes with which communications providers serving their Tribal lands are required to comply, such as rights of way, land use permitting, facilities siting, and environmental and cultural review processes. Communications providers should have documentation of any and all processes with which they currently comply. All of this information will provide the foundation for a substantive discussion of all requirements and steps for moving forward together.

**F. Compliance with Tribal Business and Licensing Requirements**

28. As sovereign institutions, Tribal governments have the authority to impose Tribal business and licensing requirements on all entities doing business on their lands. While the type and form of requirements may vary greatly from one Tribal land to another, Tribal business and licensing requirements include business practice licenses that Tribal and non-Tribal business entities, whether located on or off Tribal lands, must obtain upon application to the relevant Tribal government office or division to conduct any business or trade, or deliver any goods or services, to the Tribe, Tribal members, or Tribal lands. The form of these licenses vary greatly, including certificates of public convenience and necessity, Tribal business licenses, master licenses, and other related forms of Tribal government

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<sup>27</sup> See Traci L. Morris Ph.D., Native Public Media and Sascha D. Meinrath, New America Foundation, *NEW MEDIA, TECHNOLOGY AND INDIAN USE IN INDIAN COUNTRY: QUANTITATIVE AND QUALITATIVE ANALYSES* (Nov. 19, 2009) (*NPM/NAF New Media Study*).

<sup>28</sup> See *USF/ICC Transformation Order*, 26 FCC Red at 17868-69, para. 637.

<sup>29</sup> See generally 25 C.F.R. Part 169 – Rights-of-Way Over Indian Lands.

## Federal Communications Commission

DA 12-1165

licensure.<sup>30</sup>

29. As part of the Tribal engagement obligation, Tribal governments and communications providers should come to the table prepared to discuss in detail the relevant Tribal business and licensing requirements. Tribal governments should have a comprehensive list of any such requirements applicable to the provision of communications services. They should be prepared to provide an explanation of precisely what all such requirements entail, including specific application procedures and timeframes, as well as the governmental offices involved in the licensing process. Communications providers should be prepared to provide evidence of compliance with any Tribal business practice licenses with which they currently comply for that Tribe. Consistent with the discussion above regarding rights of way and other permitting and review processes, the common goal here should be one of greater mutual understanding about the relevant Tribal business licensing requirements and a plan for bringing companies into compliance, where applicable.

#### IV. CONCLUSION

30. In conclusion, the Tribal engagement obligation represents an opportunity for Tribal governments and communications providers to coordinate on many issues critical to the deployment and adoption of communications technologies on Tribal lands. As discussed in the introduction, this guidance represents the first step in an iterative process. That is, this guidance will evolve over time based on initial experiences and feedback from Tribal governments and communications providers. In an effort to identify commonalities, increase efficiencies, and build upon current working relationships, ONAP will engage all regional stakeholders, as appropriate, and will respond to needs articulated by communications providers and Tribal governments.

#### V. CONTACTS

31. For further information concerning this guidance, contact the offices listed below:

**Office of Native Affairs and Policy**  
Geoffrey Blackwell at (202) 418-3629  
Irene Flannery at (202) 418-1307

**Wireless Telecommunications Bureau**  
Sue McNeil at (202) 418-7619

**Wireline Competition Bureau**  
Joseph Cavender at (202) 418-1548

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<sup>30</sup> See *USF/ICC Transformation Order*, 26 FCC Rcd at 17868-69, para. 637, n.1052.



## Informational Bulletin

### Federal Tribal Lifeline and Tribal Linkup Support Programs

Eligible residents of Tribal lands may be able to save money on their local telephone service through Tribal Lifeline and Tribal Link Up support programs. These programs are established by the Federal Communications Commission (FCC) and are available through telephone companies like Frontier. Under the Tribal Lifeline program, a qualified resident receives a reduction of up to \$34.25 per month of the cost for a single local telephone service connection to the household. Under the Tribal Link Up program, a qualified resident receives a 100 percent reduction, up to \$100, of the customary charge to install a single local telephone service connection at the customer's principal place of residence. To qualify for these programs, an individual must

1. Be a resident of a federally recognized tribal land
  2. Receive assistance from one of the following programs:
    - Bureau of Indian Affairs General Assistance
    - Tribally Administered Temporary Assistance for Needy Families (TTANF)
    - Tribal Head Start Programs (income eligible)
    - Food Distribution Program on Indian Reservations (FDPIR)
    - Medicaid
    - Supplemental Security Income (SSI)
    - Federal Public Housing Assistance (Section 8)
    - Low-Income Home Energy Assistance Program (LIHEAP)
    - National School Lunch Program's Free Lunch Program
    - Supplemental Nutrition Assistance Program (Food Stamps or SNAP)
    - Temporary Assistance for Needy Families (TANF)
- or**
3. Income must not exceed approximately 135% of the federally established poverty levels set forth for the number of persons in the applicant's household, as updated.

Tribal Lifeline and Tribal Link Up are government assistance programs. Only eligible customers may enroll in the programs, and documentation is required for enrollment. Program benefits are limited to one per household and are non-transferable.

To enroll in Tribal Lifeline or Tribal Link Up, residents may contact Frontier at 1-800-921-8101 and ask about Tribal Lifeline or Tribal Link Up.

## Line 1210 – Terms and Conditions of Voice Telephony Lifeline Plans

**CITIZENS TELECOMMUNICATIONS COMPANY OF OREGON, INC.  
P.U.C. OR. NO. 3**

Section III  
Schedule 8  
5<sup>th</sup> Revised Sheet No. 1

**FOR DEPARTMENT'S  
RECEIPT STAMP**

LOCAL SERVICE

**OREGON TELEPHONE ASSISTANCE PROGRAM (OTAP)**

A. TERRITORY

All exchanges as defined in tariffed exchange area maps.

B. DESCRIPTION

1. Pursuant to Chapter 290, Oregon Laws 1987, and Oregon Administrative Rule (OAR) Chapter 860, Division 33, the Oregon Telephone Assistance Program (OTAP) is the state counterpart to the federal Lifeline program and is governed by Federal Communication Commission 47 Code of Federal Regulations Subpart E, 54. This state and federal government assistance program provides qualifying low-income consumers with reduced monthly charges for any local residential service plan that includes voice telephony service. Eligible voice telephony services must provide voice grade access to the public switched network or its functional equivalent, access to emergency services and toll limitation services.

2. Customers must meet the eligibility requirements for OTAP/Lifeline defined in OAR 860-033-0030.

C. TERMS AND CONDITIONS

1. Qualifying low-income customers will receive the following OTAP/Lifeline credit or discount amounts each month:

	Monthly Credit
Basic Federal Lifeline support amount:	\$9.25
OTAP support amount:	3.50
<u>TOTAL support amount:</u>	<u>\$12.75</u>

2. The basic federal Lifeline support amount is applied to the End User Common Line charges or equivalent. The remaining basic federal and OTAP support amount is applied to the qualifying low-income customer's charges for intrastate services.

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ISSUED BY: KENNETH MASON  
VICE PRESIDENT  
GOVERNMENT & REGULATORY AFFAIRS  
180 S. CLINTON AVE.  
ROCHESTER, NY 14646

ISSUED:  
EFFECTIVE:  
ADVICE LETTER NO.

JULY 18, 2012  
AUGUST 1, 2012  
OR-12-07



Section III  
Schedule 8  
1st Revised Sheet No. 2

FOR DEPARTMENT'S  
RECEIPT STAMP

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LOCAL SERVICE

**OREGON TELEPHONE ASSISTANCE PROGRAM (OTAP)  
(Continued)**

D. CONDITIONS (Continued)

- |   |                             |
|---|-----------------------------|
| 3. Customer bills will reflect the OTAP/Lifeline credit or discount effective on the date specified by the Public Utility Commission of Oregon for each approved customer.  | (T)(C)<br>(T)<br>(D)<br>(D) |
| 4. Partial payments from OTAP/Lifeline customers are first applied to the allocated price of the voice telephony service component and then to toll charges or the cost of other services.  | (T)(C)                      |
| 5. OTAP/Lifeline customers may voluntarily elect toll limitation service at no charge. OTAP/Lifeline customers who subscribe to toll limitation service will not be required to pay a service deposit in order to initiate OTAP/Lifeline service. | (T)                         |
| 6. OTAP/Lifeline customers may <u>not</u> be charged the federal universal service fund fee or the monthly number-portability charge as part of their local residential service plan that includes voice telephony service.                       | (T)                         |
| 7. OTAP/Lifeline customers may <u>not</u> be charged the Access Recovery Charge or its equivalent.  | (C)                         |
| 8. The Residential Service Protection Fund surcharge must be charged to OTAP/Lifeline customers.  | (N)                         |
|   | (N)                         |

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ISSUED BY: KENNETH MASON  
VICE PRESIDENT  
GOVERNMENT & REGULATORY AFFAIRS  
180 S. CLINTON AVE.  
ROCHESTER, NY 14646

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Section III  
Schedule 9  
1st Revised Sheet No. 1

**FOR DEPARTMENT'S  
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LOCAL SERVICE

**ENHANCED LIFELINE SERVICE FOR TRIBAL LANDS**

A. APPLICABILITY

Residential customers who reside on federally recognized reservations are eligible to receive additional enhanced federal Lifeline support in order to reduce the price for basic local telephone service. An individual living on tribal lands shall qualify for an additional enhanced federal Lifeline credit of up to \$25.00 per month if the individual participates in any state or federal programs identified in Section III, Schedule 8, or in one of the following assistance programs:

- Bureau of Indian Affairs General Assistance
- Tribally Administered Temporary Assistance for Needy Families
- Head Start (only those households meeting its income qualifying standard) (C)
- National School Lunch Programs (free lunch program) (C)
- Food Distribution Program on Indian Reservations (FDPIR) (N)

If a resident of a federally recognized reservations satisfies the state's Lifeline eligibility criteria as defined in Section III, Schedule 8, the resident will receive the state support as well as the additional enhanced federal support. (C)  
(C)

B. RATE

The additional enhanced federal credit will be available to Lifeline customers who reside on reservations in the following exchange(s):

<u>Tribe/Reservation</u>	<u>Exchange</u>
Cow Creek	Canyonville

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ISSUED BY: KENNETH MASON  
VICE PRESIDENT  
GOVERNMENT & REGULATORY AFFAIRS  
180 S. CLINTON AVE.  
ROCHESTER, NY 14646

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LOCAL SERVICE

TRIBAL LINK UP PROGRAM

A. TERRITORY

All exchanges as defined in tarred exchange area maps.

B. GENERAL

The Tribal Link Up Program provides for a 100% reduction up to \$100.00 against the nonrecurring charge for connection of a residential exchange access line. This credit is only available to Tribal Land customers who meet eligibility requirements established by the FCC; see Conditions following. The credit applies to the single line serving the customer's principal residence.

C. RATE

A reduction of Service Connection charges, as specified above applies for the establishment of basic residential service.

D. CONDITIONS

1. The Tribal Link Up Program is only available to low income residential customers who meet the following criteria:
  - a. The recipient meets the income test outlined for the Oregon Telephone Assistance Program (OTAP)
  - b. Enhanced Lifeline Service for Tribal Land criteria as outlined in Section III, Schedule 9. (T)
2. Tribal Link Up Service can only be associated with the primary residential connection.

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ISSUED BY: KENNETH MASON  
VICE PRESIDENT  
GOVERNMENT & REGULATORY AFFAIRS  
180 S. CLINTON AVE.  
ROCHESTER, NY 14646

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LOCAL SERVICE

**TRIBAL LINK UP PROGRAM  
(Continued)**

(C)

D. CONDITIONS (Continued)

3. The customer can receive the benefit of the Tribal Link Up Program for a second or subsequent time only for a principal place of residence with an address different from the residence address at which Tribal Link Up assistance was provided previously. (C)(T)  
(C)
4. An applicant may defer payment of the service connection charges. Payment may be deferred up to 4 months with a payment schedule of equal payments for up to \$200.00 assessed for commencing service. Interest will not be charged on deferred payments. (T)

(D)

(D)

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ISSUED BY: KENNETH MASON  
VICE PRESIDENT  
GOVERNMENT & REGULATORY AFFAIRS  
180 S. CLINTON AVE.  
ROCHESTER, NY 14646

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