

**DOCKET NO. UM 1688**

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

Name of Eligible Telecommunications Carrier: St Paul Cooperative Telephone Assoc.

Filing date: June 11, 2014

Is this: Original submission? Yes

OR

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

Person to contact for questions:

Name: Nick Schneider

Phone number: 503-633-2111

E-mail address: [nick@stpaultel.com](mailto:nick@stpaultel.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))

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)

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, Nick Schneider, being of lawful age and duly sworn, on my oath, state that I am the Secretary/Treasurer of St Paul Cooperative Telephone Association 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, St Paul Cooperative Telephone Association 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 St Paul Cooperative Telephone Association 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 11 day of JUNE, 2014.

By: Nick Schneider

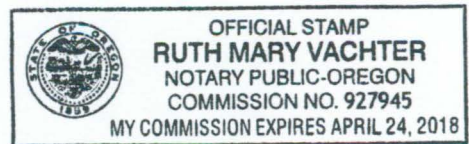
Its: Secretary/Treasurer

SUBSCRIBED AND SWORN to before me this 11 day of June, 2014.

Ruth M. Vachter

Notary public in and for the State of Oregon

My Commission Expires: 4/24/2018



<010>	Study Area Code	532396
<015>	Study Area Name	ST PAUL COOP ASSN
<020>	Program Year	2015
<030>	Contact Name: Person USAC should contact with questions about this data	Nick Schneider
<035>	Contact Telephone Number: Number of the person identified in data line <030>	5036332111 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	nick@stpaultel.com

<b>ANNUAL REPORTING FOR ALL CARRIERS</b>	<b>54.313</b>	<b>54.422</b>
	Completion Required	Completion Required

			(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"/>	
<210>	<input checked="" type="checkbox"/> <-- check box if no outages to report		<input checked="" type="checkbox"/>	
<300>	Unfulfilled Service Requests (voice)	0	<input checked="" type="checkbox"/>	
<310>	Detail on Attempts (voice)	<i>(attach descriptive document)</i>	<input type="checkbox"/>	
<320>	Unfulfilled Service Requests (broadband)	0	<input checked="" type="checkbox"/>	
<330>	Detail on Attempts (broadband)	<i>(attach descriptive document)</i>	<input type="checkbox"/>	
<400>	Number of Complaints per 1,000 customers (voice)			
<410>	Fixed	0.0	<input checked="" type="checkbox"/>	
<420>	Mobile		<input type="checkbox"/>	
<430>	Number of Complaints per 1,000 customers (broadband)			
<440>	Fixed	0.0	<input checked="" type="checkbox"/>	
<450>	Mobile	0.0	<input type="checkbox"/>	
<500>	Service Quality Standards & Consumer Protection Rules Compliance	<i>(check to indicate certification)</i>	<input checked="" type="checkbox"/>	
<510>	532396OR510.pdf	<i>(attached descriptive document)</i>	<input checked="" type="checkbox"/>	
<600>	Functionality in Emergency Situations	<i>(check to indicate certification)</i>	<input checked="" type="checkbox"/>	
<610>	532396OR610.pdf	<i>(attached descriptive document)</i>	<input checked="" type="checkbox"/>	
<700>	Company Price Offerings (voice)	<i>(complete attached worksheet)</i>	<input checked="" type="checkbox"/>	
<710>	Company Price Offerings (broadband)	<i>(complete attached worksheet)</i>	<input checked="" type="checkbox"/>	
<800>	Operating Companies and Affiliates	<i>(complete attached worksheet)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900>	Tribal Land Offerings (Y/N)?	<i>(if yes, complete attached worksheet)</i>	<input checked="" type="checkbox"/>	
<1000>	Voice Services Rate Comparability	<i>(check to indicate certification)</i>	<input checked="" type="checkbox"/>	
<1010>		<i>(attach descriptive document)</i>	<input type="checkbox"/>	
<1100>	Terrestrial Backhaul (Y/N)?	<i>(if not, check to indicate certification)</i>	<input type="checkbox"/>	
<1110>		<i>(complete attached worksheet)</i>	<input type="checkbox"/>	
<1200>	Terms and Condition for Lifeline Customers	<i>(complete attached worksheet)</i>	<input checked="" type="checkbox"/>	

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

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

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

<3000>		<i>(check to indicate certification)</i>	<input type="checkbox"/>	
<3005>		<i>(complete attached worksheet)</i>	<input checked="" type="checkbox"/>	

**(100) Service Quality Improvement Reporting  
Data Collection Form**

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

<010>	Study Area Code	532396
<015>	Study Area Name	ST PAUL COOP ASSN
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Nick Schneider
<035>	Contact Telephone Number - Number of person identified in data line <030>	5036332111 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	nick@stpaultel.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

<111> 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.

5323960R112.pdf

Name of Attached Document

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

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


<b>(200) Service Outage Reporting (Voice)</b> Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	532396
<015>	Study Area Name	ST PAUL COOP ASSN
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Nick Schneider
<035>	Contact Telephone Number - Number of person identified in data line <030>	5036332111 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	nick@stpaultel.com

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

**(700) Price Offerings including Voice Rate Data**  
**Data Collection Form**

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

<010>	Study Area Code	532396
<015>	Study Area Name	ST PAUL COOP ASSN
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Nick Schneider
<035>	Contact Telephone Number - Number of person identified in data line <030>	5036332111 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	nick@stpaultel.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</b> Data Collection Form	FCC Form 481 OMB Control No. 3060-0986 / OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	532396
<015> Study Area Name	ST PAUL COOP ASSN
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Nick Schneider
<035> Contact Telephone Number - Number of person identified in data line <030>	5036332111 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	nick@stpaultel.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 --

**(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	532396
<015>	Study Area Name	ST PAUL COOP ASSN
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Nick Schneider
<035>	Contact Telephone Number - Number of person identified in data line <030>	5036332111 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	nick@stpaultel.com
<810>	Reporting Carrier	St Paul Cooperative Telephone Association
<811>	Holding Company	N/A
<812>	Operating Company	N/A

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



<b>(900) Tribal Lands Reporting 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	532396
<015> Study Area Name	ST PAUL COOP ASSN
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Nick Schneider
<035> Contact Telephone Number - Number of person identified in data line <030>	5036332111 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	nick@stpaultel.com

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

<920> Tribal Government Engagement Obligation

Name of Attached Document

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

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

Select (Yes, No, NA)

<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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<010>	Study Area Code	532396
<015>	Study Area Name	ST PAUL COOP ASSN
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Nick Schneider
<035>	Contact Telephone Number - Number of person identified in data line <030>	5036332111 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	nick@stpaultel.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	532396
<015>	Study Area Name	ST PAUL COOP ASSN
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Nick Schneider
<035>	Contact Telephone Number - Number of person identified in data line <030>	5036332111 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	nick@stpaultel.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

532396OR1210.pdf

Name of Attached Document

<1220> Link to Public Website

HTTP [www.oregon.gov/puc](http://www.oregon.gov/puc)

"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**

**Data Collection Form**

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

FCC Form 481

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

July 2013

<010>	Study Area Code	532396
<015>	Study Area Name	ST PAUL COOP ASSN
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Nick Schneider
<035>	Contact Telephone Number - Number of person identified in data line <030>	5036332111 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	nick@stpaultel.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

<b>&lt;010&gt; Study Area Code</b>	532396
<b>&lt;015&gt; Study Area Name</b>	ST PAUL COOP ASSN
<b>&lt;020&gt; Program Year</b>	2015
<b>&lt;030&gt; Contact Name - Person USAC should contact regarding this data</b>	Nick Schneider
<b>&lt;035&gt; Contact Telephone Number - Number of person identified in data line &lt;030&gt;</b>	5036332111 ext.
<b>&lt;039&gt; Contact Email Address - Email Address of person identified in data line &lt;030&gt;</b>	nick@stpaultel.com

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

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

Name of Attached Document Listing Required Information

(3011) Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

(3012) Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))

Name of Attached Document Listing Required Information

(3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2)) (Yes/No)  Yes  No

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

Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)

(3016) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation

Name of Attached Document Listing Required Information

(3018) If the response is no on line 3014, Is your company audited? (Yes/No)  Yes  No

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

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

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

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

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

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

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

(3024) Underlying information subjected to an officer certification.

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

532396OR3020.pdf, 532396OR3021.pdf

Name of Attached Document Listing Required Information

(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	532396
<b>&lt;015&gt;</b>	Study Area Name	ST PAUL COOP ASSN
<b>&lt;020&gt;</b>	Program Year	2015
<b>&lt;030&gt;</b>	Contact Name - Person USAC should contact regarding this data	Nick Schneider
<b>&lt;035&gt;</b>	Contact Telephone Number - Number of person identified in data line <030>	5036332111 ext.
<b>&lt;039&gt;</b>	Contact Email Address - Email Address of person identified in data line <030>	nick@stpaultel.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: ST PAUL COOP ASSN	
Signature of Authorized Officer: CERTIFIED ONLINE	Date 06/10/2014
Printed name of Authorized Officer: Nick Schneider	
Title or position of Authorized Officer: Seceretary/Treasuer	
Telephone number of Authorized Officer: 5036332111 ext.	
Study Area Code of Reporting Carrier: 532396	Filing Due Date for this form: 06/30/2014
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

<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	532396
<015> Study Area Name	ST PAUL COOP ASSN
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Nick Schneider
<035> Contact Telephone Number - Number of person identified in data line <030>	5036332111 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	nick@stpaultel.com

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

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent: _____	
Name of Reporting Carrier: _____	
Signature of Authorized Officer: _____	Date: _____
Printed name of Authorized Officer: _____	
Title or position of Authorized Officer: _____	
Telephone number of Authorized Officer: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier: _____	
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: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

## Attachments







## **FIVE YEAR SERVICE QUALITY IMPROVEMENT PLAN**

### **St. Paul Cooperative Telephone Association ("St. Paul")**

This 5 year improvement plan is a section of the Company's 2013 Annual Report. It is in compliance with § 54.313(a)(1) adopted in the FCC's USF/ICC Transformation Order (11-161). This document also incorporates further clarifications identified in subsequent Reconsideration Orders, as applicable, in effect prior to the filing of the Annual Report.

St. Paul has carefully developed its improvement plan, concentrating upon the delivery and continuation of a robust network which provides, at a minimum, the federally required voice and broadband connectivity as stipulated by regulatory rule. In certain situations, the plan may also incorporate specific state requirements.

St. Paul is a party to an open state docket (UM 1481) which will address the future of the state USF program and the services to be supported in the future. The results of this docket may have a chilling implication upon the Company's ability to upgrade its network.

St. Paul advises that this improvement plan has been carefully crafted, matching measured network deployment, improvement and quality service levels with known financial implications of the Transformation Order upon the company's support cash-flows. The uncertainty of such cash flows being received in the outer-years as a result of current and potential regulatory action on rural rate-of-return carriers has resulted in the Company taking a balanced yet realistic approach.

The environment in which the Company operates remains dynamic, not static. As a result, St. Paul reserves the opportunity to modify its plan in response to further regulatory decisions as they are adopted, and their implication upon the Company's financial viability in providing the required services and service level quality becomes known.

The Company will re-evaluate this plan on an annual basis. Action, however, may also be taken abruptly on the presented plan for both current and outer years in the event of evolving regulatory conditions and/or changes in technology (vendor)-driven support. All adjustments to the improvement plan in this document will be reflected and explained in subsequent annual reports.

### **OVERVIEW**

St. Paul Cooperative Telephone Association ("St. Paul"), as an Eligible Telecommunications Carrier (ETC) currently provides Universal Service supported services to one exchange, for which there is one wire center.

Consistent with Commission requirements, this Service Quality Improvement Plan addresses only St. Paul's regulated eligible telecommunications carrier operations.<sup>1</sup> A detailed description of St. Paul's plans for the provision of the supported services in the five-year period starting with January 2015 is provided herein.

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<sup>1</sup>Per 47 C.F.R. § 54.314, federal USF support, "will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended." If investments or expenses are for service areas larger than the supported service areas, then allocations of the expenditures are required.

During the calendar year 2013, St. Paul has received a total of \$149,184.00 in USF support funds. The breakdown of the funding for the year was:

- \$23,274 High Cost Loop Support,
- \$ -7,866 Local Switching Support
- \$44,928 Connect America Fund-Intercarrier Compensation Support
- \$88,848 Interstate Common Line Support

All funds were used in 2013 to both: 1) maintain, upgrade and improve the Company's network and, 2) to cover its operating expenses as necessary to permit it to offer a high level of service for both voice and broadband throughout its service area.

### **IMPROVEMENT PLANS BY YEAR (2015-2019 inclusive)**

Summary descriptions in accordance Part 54.202(a)(1)(ii) and Part 54.313(a)(1) by year and by wire center are presented in the paragraphs below and present network improvements planned for the next five years. Area and population estimates impacted by the improvements are identified in the worksheets as well as on the wire center maps.

- Network improvement expenditures identify the cost to provide those services supported by the universal service funding mechanisms. When a project involves expenditures for both regulated and non-regulated services, the non-regulated investment costs have been removed. The Company estimates non-regulated costs using the appropriate allocation rules. Details of those costs are retained by the Company and available for inspection.
- Costs are reported only for those service areas in which the Company is authorized to receive USF funding. Costs incurred outside the authorized area, if any, are excluded.

Due to the current uncertainty of the amounts of support funds the company may receive in future years, St. Paul advises the Commission that the deployment of specific network improvement projects may be modified, and the meeting of projected service goals muted, to accommodate the actual amount of support that will be received.

### **CURRENT YEAR**

St. Paul Telephone Association is an independent local exchange carrier providing telecommunications services in Marion County in Northwestern Oregon. Established in 1909, it serves a current population of 925, over a geographic area of 35 sq. miles. The service territory is generally flat with a few streams and road crossings, consisting of small and medium sized farms with a small community locale consisting of several businesses. The St. Paul community is incorporated. There are a few small family businesses; no health, medical, or police facilities are located within the community. There is a volunteer fire department, two grade schools and one High School. The schools are currently provided voice and data services on a fiber network. The Fire Department is on copper and is planned for upgrade in the 2017 North fiber build. There are no other anchor institutions located within the serving area.

The demographics of the service area reflect its rural roots. There are no Native American reservations within the area. Religious affiliations are representative of a traditional American rural community. The minority population is 14% of the overall community, mostly Hispanic and primarily seasonal.

There are approximately 389 homes passed within the service territory. According to the Census Bureau the median household income for St Paul, which approximates the company's serving area is about \$59,438. St Paul has only three Lifeline subscribers.

St. Paul serves its subscribers using a soft switch. In 2002, DSL service was offered to 100% of its service area. As of year-end 2013, St. Paul served 357 voice subscribers with a subscriber density of 10.2 per square mile. St. Paul also serves 295 DSL subscribers. St. Paul can provide 4MB/Down/1MBUp to 98% of their service area. There is about 45 route miles of facilities.

St. Paul lost no voice subscribers and gained 4 broadband subscribers in 2013.

No terrestrial competitor offers voice and data service throughout the service area.

For the year 2013, St. Paul installed a main distribution fiber to replace its copper at a cost of \$130,000. Work continues on the project into 2014 to install drops and connect to the customers' homes. Approximately 48 homes are passed on this project. As of 2012, St. Paul' toll network is all fiber-based.

## **SUMMARY DISCUSSION OF PLANS BY YEAR**

### **2015 Blanchet West Project**

The Blanchet West project cost is estimated at \$56,420.00. The project involves placement of about 1 mile of fiber to service 40 subscribers. When completed the 40 subscribers will have broadband speeds up to 20MB download and 10MB upload. This project is scheduled for completion in the third quarter of 2015. St Paul Telephone expects an increase in broadband subscribership as the result of this project based on past experience of copper connected customers who were upgraded to FttH. St Paul staff will review deployment and be on-site with daily and monthly progress reports.

## **2016 South End Project**

The South End project cost is estimated at \$105,220.00. The project involves placement of about 2.1 miles of fiber to feed a Subscriber Remote Terminal. That remote is currently being fed by copper cable. The remote is serving about 30 customers. This will increase the amount of broadband capacity that the customers now have available to them. The project is scheduled for completion in the fourth quarter of 2016. St Paul staff will review deployment and be on-site with daily and monthly progress reports.

## **2017 South End Phase 2**

The South End Phase 2 project is estimated at \$82,250.00. The project involves placement of about 1.5 miles of fiber drop to about 45 customers. When completed the 45 subscribers will have broadband speeds up to 20MB download and 10MB upload. This project is scheduled for completion in the fourth quarter of 2017. St Paul Telephone expects an increase in broadband subscribership as the result of this project based on past experience with copper connected customers upgraded to FttH. St Paul staff will review deployment and be on-site with daily and monthly progress reports.

## **2018 North End Project**

The North End project cost is estimated at \$90,040.00. The project involves placement of about 1 mile of fiber to service 45 subscribers. When completed the 45 subscribers will have broadband speeds up to 20MB download and 10MB upload. This project is scheduled for completion in the fourth quarter of 2018. St Paul Telephone expects an increase in broadband subscribership as the result of this project based on past experience of copper connected customers upgraded to FttH. St Paul staff will review deployment and be on-site with daily and monthly progress reports.

## **2019 North End Project Phase 2**

The North End project Phase 2 cost is estimated at \$107,040.00. The project involves placement of about 2 miles of fiber to service 30 subscribers. When completed the 30 subscribers will have broadband speeds up to 20MB download and 10MB upload. This project is scheduled for completion in the fourth quarter of 2019. St Paul Telephone expects an increase in broadband subscribership as the result of this project based on past experience of copper connected customers upgraded to FttH. St Paul staff will review deployment and be on-site with daily and monthly progress reports.

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#### Consumer Protection

St. Paul Cooperative Telephone Association complies with the requirements of 47 CFR Part 64 Subpart U, Customer Proprietary Network information and the Federal Trade Commission Red Flag rules to prevent identity theft. A manual for each of those programs is in place and is part of the employee's handbook. Employee training is conducted annually and new hires are instructed on the programs as required by their job functions.

#### Service Quality Standards

##### Voice

St. Paul Cooperative Telephone Association complies with the service standards of the State of Oregon as promulgated in the Oregon Administrative Rules 860-034-0390, Retail Telecommunications Service Standards for Small Telecommunications Utilities.

##### Broadband

St. Paul Cooperative Telephone Association complies with the service standards as established by NECA Tariff #5 and is committed to provide the highest quality service to its broadband customers.

St Paul Cooperative Telephone Association

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54.313 (a)(6) Ability to Remain functional in emergency Situations

Back-up Power

St. Paul Cooperative Telephone Association has the following back-up power capabilities:

Switches – stand alone and/or host

Switch A 30kw Generator, propane fuel, 250 gallon fuel tank also 15 hour of battery back-up.

Remote Central Offices

No Remote Offices

Subscriber carrier )DLC, AFC, OPM, etc)

Calix 1 10 Hours of battery back-up also have portable generator.

Calix 2 Same as above.

Calix 3 Same as above.

Calix 4 Same as above.

Network Interface Devices (NIDs)

St. Paul Cooperative Telephone Association has 313 customers with metallic (copper) connections to the Central Office and their NIDs are powered from the Central Office.

St Paul Cooperative Telephone Association has 44 customers with non-metallic (fiber optic) connections to the Central Office. These customers' NIDs are battery powered in case of emergency. The batteries are rated to last 8 hours.

Ability to reroute traffic around damaged facilities:

St Paul Cooperative Telephone Association is investigating the installation of redundant facilities for interexchange carrier traffic.

Capability to manage traffic spikes resulting from emergency situations

St. Paul Cooperative Telephone Association has 357 customers, switching capacity of 1000 simultaneous calls, and transport capacity for 96 simultaneous calls. St Paul Cooperative Telephone Association takes no responsibility for the capabilities of interconnected networks to manage traffic spikes resulting from emergency situations, but will continue its best efforts for its networks during such events.



## **LIFELINE FOR ST PAUL COOPERATIVE TELEPHONE ASSOCIATION CUSTOMERS**

**Lifeline**, also known as Oregon Telephone Assistance Program (OTAP), is a government program that offers qualified people a discount on their monthly local telephone bill. You will save up to \$12.75 for your basic monthly bill. You're eligible for Lifeline if you participate in any of the following programs; Food Stamps, Low Income Home Energy Assistance Program (LIHEAP), Supplemental Security Income (SSI), Welfare Medical ID Card, Oregon Health Plan. And are at or below 135% of the federal poverty level guidelines based on annual income and number of household.

Being a Lifeline customer does not protect you from being disconnected if you fail to pay your telephone bill.

To receive an application for Lifeline Service you may contact the Residential Service Protection Fund (RSPF) Programs at 1-800-848-4442 or 503-373-7171 in Salem; TTY users can call 1-800-648-3458; or write to:

Oregon Public Utility Commission RSPF  
550 Capitol St NE, Suite 215  
Salem, Or. 97301-2551.

### **Lifeline y para los consumidores de la Cooperativa de la Asociacion de Telefonos.**

**Lifeline**, tambien conocida como el Programa de Asistencia Telefonica de Oregon (OTAP), es un programa del gobierno que ofrece a personas calificadas un descuento en su cuenta mensual telefonica. Usted ahorrara hasta \$12.75 para su cuenta basica mensual. Usted es elegible para Lifeline, si usted participa en cualquier de los siguientes programas; Estampillas de Comida, Programa de Asistencia con la Electricidad para personas de bajos recursos (LIHEAP), Beneficios de Desabilidad para Persona Incapacitada (SSI), Tarjeta de Seguro Medico, El Plan de Salud de Oregon y si esta en el nivel o mas bajo del 135% del nivel de pobreza federal basado en la guia annual de recursos o en el numero de miembros de familia.

Ser miembro de **Lifeline** no le protegera de estar desconectado de servicio si usted no paga su cuenta mensual.

Para recibir una solicitud para **Lifeline** favor de ponerse en contacto con Residential Service Protection Fund (RSPF) al 1-800-848-4442 o 503-373-7171 en Salem; Consumidores Sordos pueden llamar al 1-800-648-3458; o escribir a:

Oregon Public Utility Commission RSPF  
550 Capitol St. NE, Suite 215  
Salem, Or. 97301-2551

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Lifeline subscribers receive the same residential service as a regular subscriber, but at a reduced monthly recurring rate. Thus, lifeline subscribers have an unlimited number of local calling minutes. As for toll, lifeline subscribers, similar to every St. Paul Cooperative Telephone Association subscriber, are free to choose their own toll usage plans through IXCs that serve St. Paul Cooperative Telephone Association.

**ST. PAUL COOPERATIVE TELEPHONE ASSOCIATION****Statements of Cash Flows**

Years Ended December 31, 2013 and 2012

	<u>2013</u>	<u>2012</u>
Cash Flows from Operating Activities:		
Net margin	\$ 150,598	\$ 122,932
Adjustments to reconcile net margin to net cash provided by operating activities:		
Depreciation	138,382	133,955
Depreciation on nonregulated equipment	3,400	-
Changes in assets and liabilities:		
Accounts receivable	15,002	7,698
Prepaid expenses	(2,522)	(661)
Accounts payable	6,483	(178)
Accrued expenses	1,881	3,946
Customer deposits	600	(500)
Net Cash Provided by Operating Activities	<u>313,824</u>	<u>267,192</u>
Cash Flows from Investing Activities:		
Purchases of plant and equipment	(137,057)	(180,094)
Purchases of nonregulated equipment	(37,203)	-
Proceeds from sales and maturities of marketable securities	61,599	79,978
Purchases of marketable securities	<u>(52,682)</u>	<u>(116,575)</u>
Net Cash Used by Investing Activities	<u>(165,343)</u>	<u>(216,691)</u>
Cash Flows from Financing Activities:		
Federal communications excise tax refunds	-	1,008
Decrease in memberships	(1,846)	(855)
Retirement of patronage capital	<u>(80,561)</u>	<u>(77,340)</u>
Net Cash Used by Financing Activities	<u>(82,407)</u>	<u>(77,187)</u>
Net Increase (Decrease) in Cash and Cash Equivalents	66,074	(26,686)
Cash and Cash Equivalents, beginning	<u>325,885</u>	<u>352,571</u>
Cash and Cash Equivalents, ending	<u>\$ 391,959</u>	<u>\$ 325,885</u>

**ST. PAUL COOPERATIVE TELEPHONE ASSOCIATION****Balance Sheets**

December 31, 2013 and 2012

<b>ASSETS</b>	<u>2013</u>	<u>2012</u>
Current Assets:		
Cash	\$ 391,959	\$ 325,885
Marketable securities	651,261	693,318
Accounts receivable, net of allowance for doubtful accounts of zero	75,150	90,152
Prepaid expenses	<u>22,787</u>	<u>20,265</u>
Total Current Assets	<u>1,141,157</u>	<u>1,129,620</u>
Other Investments	<u>21,647</u>	<u>21,647</u>
Property, Plant, and Equipment:		
In service	3,004,316	2,799,197
Construction in process	<u>81,791</u>	<u>116,049</u>
	3,086,107	2,915,246
Less accumulated depreciation	<u>1,644,157</u>	<u>1,505,774</u>
Property, Plant, and Equipment, net	<u>1,441,950</u>	<u>1,409,472</u>
	<u>\$ 2,604,754</u>	<u>\$ 2,560,739</u>
<b>LIABILITIES AND MEMBERS' EQUITY</b>		
Current Liabilities:		
Accounts payable	\$ 22,877	\$ 16,394
Accrued expenses	9,457	7,576
Customer deposits	<u>2,500</u>	<u>1,900</u>
Total Current Liabilities	<u>34,834</u>	<u>25,870</u>
Unclaimed Patronage Capital Distributions Payable	<u>18,612</u>	<u>26,220</u>
Members' Equity:		
Memberships - fully paid	114,000	117,000
Memberships - partly paid	10,396	9,242
Other equity	570,560	506,468
Accumulated other comprehensive income	13,664	46,804
Patronage capital	<u>1,842,688</u>	<u>1,829,135</u>
Total Members' Equity	<u>2,551,308</u>	<u>2,508,649</u>
	<u>\$ 2,604,754</u>	<u>\$ 2,560,739</u>

**ST. PAUL COOPERATIVE TELEPHONE ASSOCIATION****Statements of Operations**

Years Ended December 31, 2012 and 2011

	<u>2013</u>	<u>2012</u>
Operating Revenues:		
Local network	\$ 112,764	\$ 108,581
Network access	566,048	559,159
Long distance	43,149	46,662
Miscellaneous	<u>41,526</u>	<u>32,740</u>
Total Operating Revenues	<u>763,487</u>	<u>747,142</u>
Operating Expenses:		
Plant specific operations	142,537	136,152
Plant nonspecific operations	17,514	28,923
Depreciation	138,382	133,955
Long distance	31,907	34,276
Customer operations	113,440	112,200
Corporate operations	225,819	200,137
Operating taxes	<u>18,192</u>	<u>18,880</u>
Total Operating Expenses	<u>687,791</u>	<u>664,523</u>
Operating Margin	<u>75,696</u>	<u>82,619</u>
Other Income (Expense):		
Investment and other income	32,395	34,496
Net nonregulated activities	3,426	5,817
Ticketing services, net	<u>39,081</u>	<u>-</u>
Total Other Income (Expense)	<u>74,902</u>	<u>40,313</u>
Net Margin	<u>\$ 150,598</u>	<u>\$ 122,932</u>

A complete copy of the Financial Statements audited by AKT LLP may be seen during regular office hours at: St. Paul Cooperative Telephone Association, St. Paul, OR.



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## INDEPENDENT AUDITORS' REPORT

The Board of Directors  
St. Paul Cooperative Telephone Association  
St. Paul, Oregon

We have audited the accompanying financial statements of St. Paul Cooperative Telephone Association, which comprise the balance sheets as of December 31, 2013 and 2012, and the related statements of operations, comprehensive income, changes in members' equity, and cash flows for the years then ended, and the related notes to the financial statements.

### Management's Responsibility for the Financial Statements

Management is responsible for the preparation and fair presentation of these financial statements in accordance with accounting principles generally accepted in the United States of America; this includes the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

### Auditors' Responsibility

Our responsibility is to express an opinion on these financial statements based on our audits. We conducted our audits in accordance with auditing standards generally accepted in the United States of America. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the financial statements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

### Opinion

In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of St. Paul Cooperative Telephone Association, as of December 31, 2013 and 2012, and the results of its operations and its cash flows for the years then ended in accordance with accounting principles generally accepted in the United States of America.

*AKT LLP*

Salem, Oregon  
March 18, 2014

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