

DOCKET NO. UM 1768

**Cover Sheet for Submission of
2016 Annual ETC Certification Reports**

Name of Eligible Telecommunications Carrier: St Paul Cooperative Telephone Association

Filing date: June 13, 2016

Is this: Original submission? X

OR

Revised submission?

Person to contact for questions:

Name Nick Schneider

Phone number 503-633-2111

E-mail address 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)) – if separate from Form 481

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

Form 690 (Mobility Fund per 47 CFR § 54.1009)

X Affidavit for High-Cost Support

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, 2016. The CAF/ICC support data are due the same day as the ETC's interstate access tariff filing.

¹ 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 (2015) and will be used in the coming calendar year (2017) only for the provision, maintenance and upgrading of facilities and services for which the support is intended.

DATED this 13th day of June, 2016.

By: *Nick Schneider*

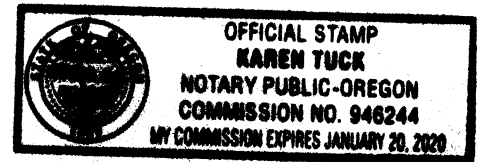
Its: Secretary/Treasurer

SUBSCRIBED AND SWORN to before me this 13 day of June, 2016.

Karen Tuck

Notary public in and for the State of Oregon

My Commission Expires: 1-20-2020



**FCC Form 481 - Carrier Annual 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	2017
<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
Form Type	54.313 and 54.422

(100) Service Quality Improvement Reporting 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	2017
<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) <input type="radio"/> <input checked="" type="radio"/>
<111> If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service?	(yes / no) <input type="radio"/> <input type="radio"/>

If your answer to Line <111> is yes, please 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.

StPaulTel 532396OR112.pdf

<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.	
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Please select the appropriate responses below (Yes, No, Not Applicable) 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.

Name of Attached Document

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

(300) Unfulfilled Service Request
Data Collection Form

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

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<020> Program Year	2017
<030> Contact Name - Person USAC should contact regarding this data	Nick Schneider
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<039> Contact Email Address - Email Address of person identified in data line <030>	nick@stpaultel.com

<300> Unfulfilled service request (voice)

<310> Detail on attempts (voice) _____
Name of Attached Document

<320> Unfulfilled service request (broadband)

<330> Detail on attempts (broadband) _____
Name of Attached Document

(400) Number of Complaints per 1,000 customers
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	2017
<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
<400>	Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize.	Offered only fixed voice
<410>	Complaints per 1000 customers for fixed voice	0.0
<420>	Complaints per 1000 customers for mobile voice	
<430>	Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize.	Offered only fixed broadband
<440>	Complaints per 1000 customers for fixed broadband	0.0
<450>	Complaints per 1000 customers for mobile broadband	

**(500) Compliance With Service Quality Standards and Consumer Protection Rules
Data Collection Form**FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

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<020> Program Year	2017
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<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
<500> Certify compliance with applicable service quality standards and consumer protection rules	Yes
<510> Descriptive document for Service Quality Standards & Consumer Protection Rules Compliance	StPaulTel_532396OR510.pdf

<010> Study Area Code	532396
<015> Study Area Name	ST PAUL COOP ASSN
<020> Program Year	2017
<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
<600> Certify compliance regarding ability to function in emergency situations	Yes
<610> Descriptive document for Functionality in Emergency Situations	StPaulTel 532396OR610.pdf

**(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
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<020>	Program Year	2017
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<039>	Contact Email Address - Email Address of person identified in data line <030>	nick@stpaultel.com

<701>	Residential Local Service Charge Effective Date	1/1/2016
<702>	Single State-wide Residential Local Service Charge	

<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

(900) Tribal Lands Reporting Data Collection Form FCC Form 481
OMB Control No. 3060-0986 / OMB Control No. 3050-0819
July 2013

<010> Study Area Code 532396
 <015> Study Area Name ST PAUL COOP ASSN
 <020> Program Year 2017
 <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

<900> Does the filing entity offer tribal land services? (Y/N) No

<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 or No or Not Applicable
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(1000) Voice and Broadband Service Rate Comparability 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	2017
<030>	Contact Name - Person USAC should contact regarding this data	Nick Schneider
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<039>	Contact Email Address - Email Address of person identified in data line <030>	nick@stpaultel.com

<1000> Voice services rate comparability certification Yes

<1010> Attach detailed description for voice services rate comparability compliance

Name of Attached Document

<1020> Broadband comparability certification

Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau

<1030> Attach detailed description for broadband comparability compliance

Name of Attached Document

(1100) No Terrestrial Backhaul 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	2017
<030>	Contact Name - Person USAC should contact regarding this data	Nick Schneider
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<039>	Contact Email Address - Email Address of person identified in data line <030>	nickstpaultel.com

<1100> Certify whether terrestrial backhaul options exist (Y/N)

<1130> Please select the appropriate response (Yes, No, Not Applicable) 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).

(1200) Terms and Condition for Lifeline Customers Lifeline Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<1210> Terms & Conditions of Voice Telephony Lifeline Plans

StPaulTel 532396OR1210.pdf

Name of Attached Document

<1220> Link to Public Website

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 <i>Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers</i>	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	2017
<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

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental 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)(i) - Note that for the July 1 2016 certification, this applies to Round 2 recipients of Incremental Support	<input style="width: 100%; height: 20px;" type="text"/>	
<2011>	3rd Year Certification 47 CFR § 54.313(b)(1)(ii) - Note that for the July 1 2016 certification, this applies to Round 1 recipients of Incremental Support	<input style="width: 100%; height: 20px;" type="text"/>	
<2022>	Recipient certifies, representing year two after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients only.	<input style="width: 100%; height: 20px;" type="text"/>	
<2023>	The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year two - 54.313(b)(2)(ii). Round 2 recipients only.	<input style="width: 100%; height: 20px;" type="text"/>	
<2024A>	Round 2 Recipient of Incremental Support?	<input style="width: 100%; height: 20px;" type="text"/>	
<2024B>	Attach list of census blocks indicating where funding was spent in year two - 54.313(b)(2)(ii). Round 2 recipients only.	<input style="width: 100%; height: 20px;" type="text"/>	Name of Attached Document Listing Required Information
<2025A>	Round 1 or Round 2 Recipient of Incremental Support?	<input style="width: 100%; height: 20px;" type="text"/>	
<2025B>	Attach geocoded Information for Phase I milestone reports (Round 1 for year three and Round 2 for year two) - Connect America Fund , WC Docket 10-90, Report and Order, FCC 13-	<input style="width: 100%; height: 20px;" type="text"/>	Name of Attached Document Listing Required Information
<2015>	2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)	<input style="width: 100%; height: 20px;" type="text"/>	

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)}

<2017A> Connect America Fund Phase II recipient?

<2017B> Attach information for Phase II - 54.313(e)(1) - list of geocoded locations already meeting the 54.309 public interest obligations at the end of calendar year 2015 and total amount of Phase II support, if any, the price

Name of Attached Document Listing Required Information

<2018> Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(2)(ii)

Name of Attached Document Listing Required Information

<2019> Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(2)(v)

<2020> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 40% of its supported locations in the state on December 31, 2017 - 54.313(e)(3)

<2021> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 60% of its supported locations in the state on December 31, 2018 - 54.313(e)(4)

<2026> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 80% of its supported locations in the state on December 31, 2019 - 54.313(e)(5)

<2027> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 100% of its supported locations in the state on December 31, 2020 - 54.313(e)(6)

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 <039> Contact Email Address - Email Address of person identified in data line <030> nick@stpaultel.com

Complete the items below to note compliance with 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.

(3009) Progress Report on 5 Year Plan
 Carrier certifies to 54.313(f)(1)(iii)

Yes - Attach Certification

(3010A) Milestone Certification {47 CFR § 54.313(f)(1)(i)}

StPaulTel 532396OR3010.pdf

(3010B) Please Provide Attachment

Name of Attached Document Listing Required Information

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

No - No New Community Anchors

(3012B) Please Provide Attachment

Name of Attached Document Listing Required Information

(3013) Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)}

(Yes/No)

(3014) If yes, does your company file the RUS annual report

(Yes/No)

Please check these boxes to confirm that the attached PDF, 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) with 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 Borrowers

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

(3021) Management letter and/or audit opinion 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

StPaulTel 532396OR3020.pdf, StPaulTel 532396OR3021.pdf

(3005) Rate Of Return Carrier Additional Documentation (Continued) Data Collection Form	FCC Form 481 OMB Control No. 3060-0985/OMB Control No. 3060-0819 July 2013
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<039> Contact Email Address - Email Address of person identified in data line <030>	nick@stpaultel.com

Financial Data Summary

(3027) Revenue	788411
(3028) Operating Expenses	678836
(3029) Net Income	206184
(3030) Telephone Plant In Service(TPIS)	1752042
(3031) Total Assets	2938638
(3032) Total Debt	0
(3033) Total Equity	2938638
(3034) Dividends	0

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4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission's public interest obligations. All RBE participants must provide a response to Line 4001.

4001. Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

Community Anchor Institutions – FCC 14-98 (paragraph 79)

4003a. RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

If yes to 4003A, please provide a response for 4003B.

4003b. Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year. Name of Attached Document Listing Required Information

Broadband Deployment Locations – FCC 14-98 (paragraph 80)

4004a. Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481. Name of Attached Document Listing Required Information

4004b. Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband speed and data usage allowances available in the relevant geographic area. Name of Attached Document Listing Required Information

Certification - Reporting Carrier
Data Collection Form

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

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

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
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 06/13/2016
Printed name of Authorized Officer:	Nick Schneider
Title or position of Authorized Officer:	Sec/Tres
Telephone number of Authorized Officer:	5036332111 ext.
Study Area Code of Reporting Carrier:	532396 Filing Due Date for this form: 07/01/2016
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.	

Certification - Agent / Carrier 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>	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 Firm: _____	
Signature of Authorized Agent or Employee of Agent: _____	Date: _____
Name of Authorized Agent Employee: _____	
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

St Paul Cooperative Telephone Association
(“St. Paul”)
2016

PROGRESS REPORT ON SERVICE QUALITY IMPROVEMENT PLAN

This document is an integral part of the Company’s 2016 Annual Report, as attached to Form 481. It is in compliance with §54.313(a)(1) adopted in the FCC’s USF/ICC Transformation Order (11-161) and incorporates all further clarifications identified in subsequent Reconsideration Orders, as applicable, that were in effect at the time the Annual Report was due by Rule to the requisite regulatory authorities.

St. Paul Telco advises that the environment in which the Company operates is dynamic, not static. As a result, certain network targets identified in its initial 5 Year Network Improvement Plan, filed in 2014, may be modified in response to regulatory decisions that have been subsequently adopted, and as their implication upon the Company’s financial viability in providing the required services and service level quality became known.

Modifications to the network plan may also have been taken due to changes in market conditions, technology, vendor-driven support, weather, or emergency related contingencies.

Targets not met or changed since the initial 5 Year Plan filing are identified and reasons provided for those changes.

UNIVERSAL SERVICE SUPPORT RECEIVED IN 2015

Per the Universal Service Administrative Company (USAC), as available for the period up to this filing, St. Paul Telco received a total of \$183,454 in USF support funds. The breakdown of the funding to the point of filing is:

- \$ 6,154 High Cost Loop Support
- \$ 75,270 Connect America Fund-Intercarrier Compensation Support
- \$102,030 Interstate Common Line Support

Universal Service Support funds are used to: 1) maintain, upgrade, and improve the Company’s network and, 2) cover operating expenses and debt commitments as necessary to permit it to offer a high level of service for both voice and broadband within the authorized serving area.

USF support will continue to be included in the Company’s current revenue accounts and forward-looking projections. Revenues, in the aggregate, are used for both capital expenditures as well as to cover operating expenses and fixed costs incurred to obtain capital from lenders. The Company does not segregate USF separately for purposes of capital and operating expenditures; USF is expended in the same proportion as all other revenues.

The proportionate share of USF expenditures in 2015 for CAPEX is estimated to be \$91,727.00 (50%); for OPEX \$91,727.00 (50%).

In the accompanying 2015 project detail, expenditures for network improvements sometimes involve service quality, coverage and capacity as an integrated improvement project and are not mutually exclusive from one another. In terms of cost, projects involving multiple qualifiers are of equal dollar equivalence. Where a project involves a single qualifier, it is so noted.

PROGRESS REPORT

All targets stated in the initial 5 Year plan were met.

2015 Blanchet West Project

St Paul Telephone used operating cash flow to deploy FttH for the Blanchet West Project. This project was completed in the fourth quarter of 2015.

The Blanchet West project cost was \$97,450. The project involved placement of about 1 mile of fiber to service 40 subscribers with access to broadband speeds up to 60MB download and 30MB upload. 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.

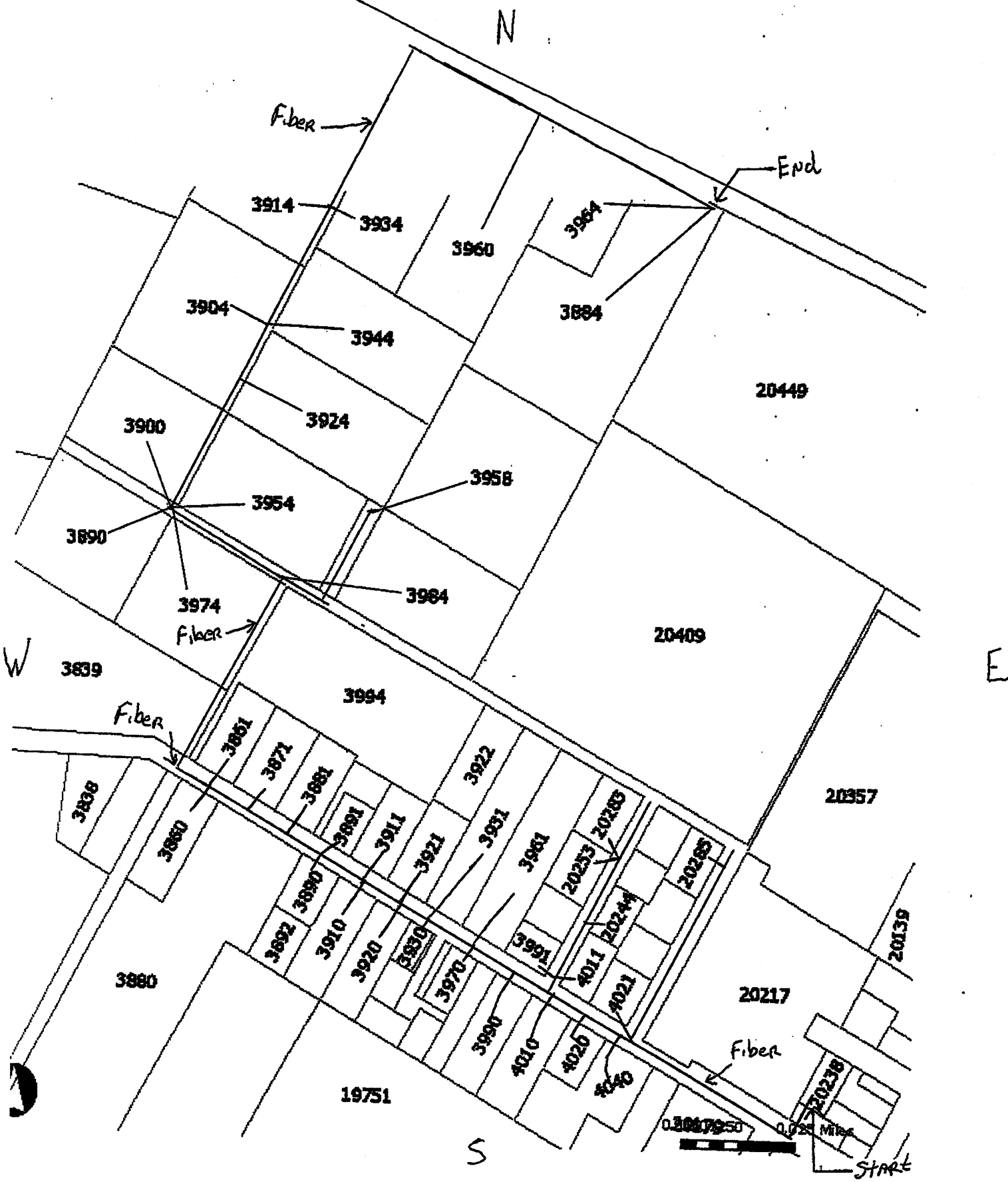
This project provided Service Quality, Coverage and Capacity upgrades.

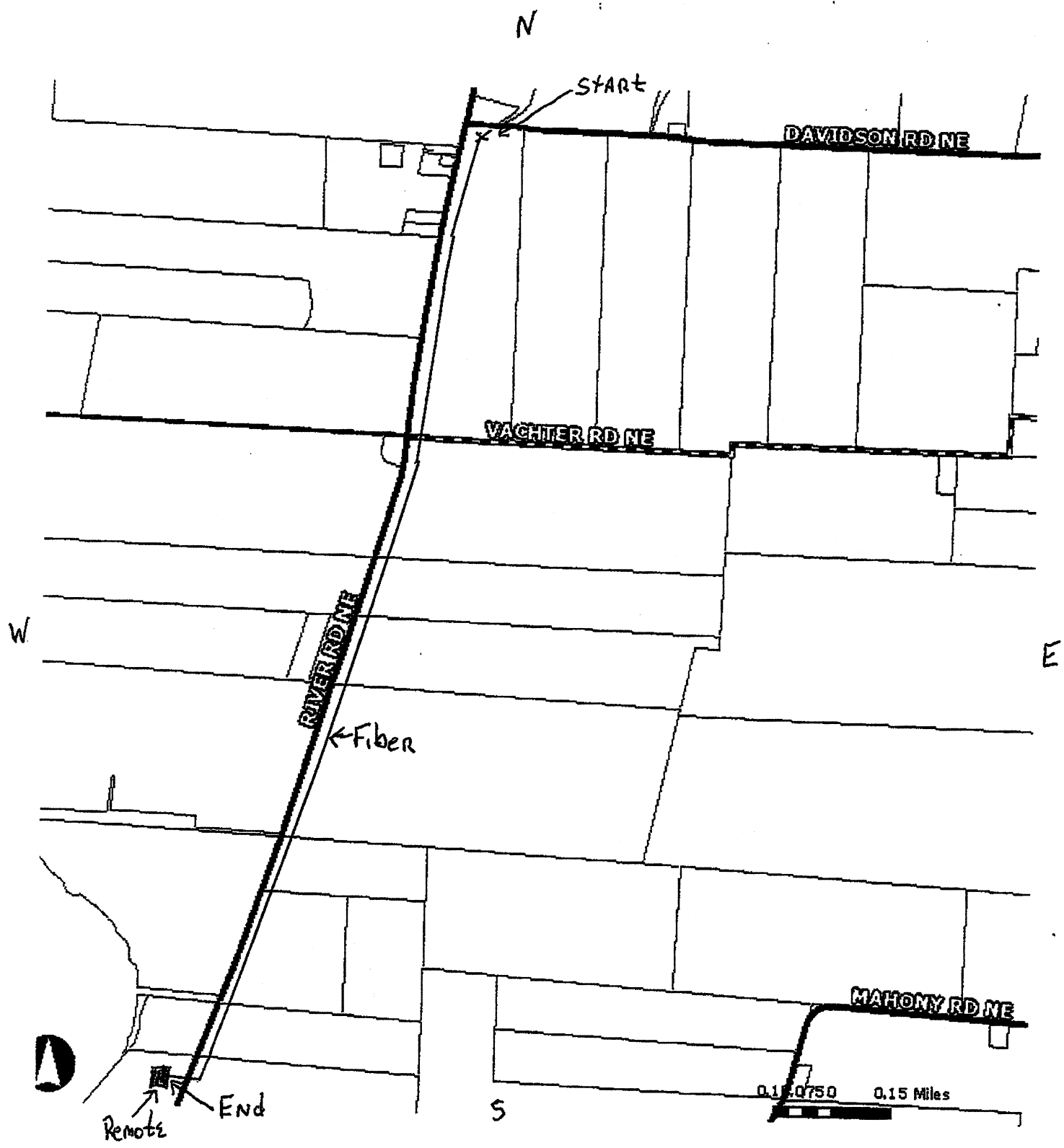
2015 South End Project

St Paul Telephone used operating cash flow to replace copper cable with fiber to feed the Subscriber Remote Terminal. This project was scheduled for 2016 but due to the increased amount of usage in bandwidth it was decided to complete this project in 2015.

The South End project cost was \$127,220. The project involved placement of about 2.1 miles of fiber to feed a Subscriber Remote Terminal. That remote was previously 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.

This project provided Service Quality, Coverage and Capacity upgrades





St Paul Telephone
South End Project

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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 237 customers with metallic (copper) connections to the Central Office and their NIDs are powered from the Central Office.

St Paul Cooperative Telephone Association has 120 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
Po Box 1088
Salem, Or. 97308

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 anual 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
PO Box 1088
Salem, Or. 97308



June 10, 2016

532396OR3010

Ms Marlene H. Dortch
Secretary
Federal Communications Commission
9300 East Hampton Drive
Capitol Heights, MD 20743

RE: WC Docket No. 14-58, 2015 Annual Report, Form 481 for High-Coast
Recipient 54.313(f)(1) "Milestone Certification"

Dear Ms Dortch:

In compliance with the filing requirements associated with, and
attached to Form 481, we wish to advise the Commission that St Paul
Cooperative Telephone Association:

Has taken reasonable steps to provide upon reasonable request
broadband service at actual speeds of 10 Mbps downstream/1
Mbps upstream:

Provides latency suitable for real-time applications including VoIP
and usage capacity which is reasonably comparable to those in
urban areas and;

That reasonable requests for service are met within a reasonable
timeframe.

If there are questions, I may be contacted at 503-633-2111.

Sincerely,

A handwritten signature in black ink, appearing to read "Nick Schneider", is written over a horizontal line.

Nick Schneider
Manager

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

December 31, 2015 and 2014

	<u>2015</u>	<u>2014</u>
Operating Revenues:		
Local network	\$ 108,772	\$ 110,894
Network access	573,431	542,442
Long distance	37,614	40,330
Miscellaneous	<u>68,594</u>	<u>72,789</u>
Total Operating Revenues	<u>788,411</u>	<u>766,455</u>
Operating Expenses:		
Plant specific operations	125,618	124,027
Plant nonspecific operations	27,655	24,060
Depreciation	159,078	154,178
Long distance	25,183	29,120
Customer operations	101,381	115,123
Corporate operations	216,276	191,375
Operating taxes	<u>23,645</u>	<u>18,515</u>
Total Operating Expenses	<u>678,836</u>	<u>656,398</u>
Operating Margin	<u>109,575</u>	<u>110,057</u>
Other Income:		
Investment and other income	42,185	48,936
Nonregulated activity, net	38,711	25,146
Ticketing services, net	<u>15,713</u>	<u>11,591</u>
Total Other Income	<u>96,609</u>	<u>85,673</u>
Net Margin	<u>\$ 206,184</u>	<u>\$ 195,730</u>

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

December 31, 2015 and 2014

ASSETS	<u>2015</u>	<u>2014</u>
Current Assets:		
Cash and cash equivalents	\$ 605,077	\$ 392,654
Marketable securities	460,783	661,480
Accounts receivable, net of allowance for doubtful accounts of zero	73,250	74,899
Prepaid expenses	<u>25,839</u>	<u>21,016</u>
Total Current Assets	<u>1,164,949</u>	<u>1,150,049</u>
Other Investments	<u>21,647</u>	<u>21,647</u>
Property, Plant, and Equipment:		
In service	3,687,407	3,264,032
Construction in process	<u>22,047</u>	<u>106,602</u>
	3,709,454	3,370,634
Less accumulated depreciation	<u>1,957,412</u>	<u>1,798,334</u>
Property, Plant, and Equipment, net	<u>1,752,042</u>	<u>1,572,300</u>
	<u>\$ 2,938,638</u>	<u>\$ 2,743,996</u>
LIABILITIES AND MEMBERS' EQUITY		
Current Liabilities:		
Accounts payable	\$ 119,927	\$ 18,303
Accrued expenses	9,500	9,605
Customer deposits	<u>3,300</u>	<u>2,800</u>
Total Current Liabilities	<u>132,727</u>	<u>30,708</u>
Unclaimed Patronage Capital Distributions Payable	<u>18,157</u>	<u>18,424</u>
Members' Equity:		
Memberships - fully paid	107,500	111,000
Memberships - partly paid	14,222	12,255
Other equity	733,067	662,087
Accumulated other comprehensive income (loss)	(1,278)	35,404
Patronage capital	<u>1,934,243</u>	<u>1,874,118</u>
Total Members' Equity	<u>2,787,754</u>	<u>2,694,864</u>
	<u>\$ 2,938,638</u>	<u>\$ 2,743,996</u>

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

December 31, 2015 and 2014

	<u>2015</u>	<u>2014</u>
Cash Flows from Operating Activities:		
Net margin	\$ 206,184	\$ 195,730
Adjustments to reconcile net margin to net cash provided by operating activities:		
Realized gain on marketable securities	(7,044)	-
Depreciation	159,078	154,178
Depreciation on nonregulated equipment	11,711	11,338
Changes in operating assets and liabilities:		
Accounts receivable	1,649	251
Prepaid expenses	(4,823)	1,771
Accounts payable	1,196	(4,574)
Accrued expenses	(105)	148
Customer deposits	500	300
Net Cash Provided by Operating Activities	<u>368,346</u>	<u>359,142</u>
Cash Flows from Investing Activities:		
Purchases of plant and equipment	(243,162)	(286,416)
Purchases of nonregulated equipment	(6,941)	(9,450)
Proceeds from sales and maturities of marketable securities	176,239	725,956
Purchases of marketable securities	<u>(5,180)</u>	<u>(714,435)</u>
Net Cash Used by Investing Activities	<u>(79,044)</u>	<u>(284,345)</u>
Cash Flows from Financing Activities:		
Decrease in memberships	(1,533)	(1,141)
Retirement of patronage capital	<u>(75,346)</u>	<u>(72,961)</u>
Net Cash Used by Financing Activities	<u>(76,879)</u>	<u>(74,102)</u>
Net Increase in Cash and Cash Equivalents	212,423	695
Cash and Cash Equivalents, beginning	<u>392,654</u>	<u>391,959</u>
Cash and Cash Equivalents, ending	<u>\$ 605,077</u>	<u>\$ 392,654</u>
Supplemental Disclosures of Noncash Investing and Financing Activities:		
Noncash additions of property and equipment	<u>\$ 100,428</u>	<u>\$ -</u>

See accompanying notes to financial statements.



INDEPENDENT AUDITORS' REPORT

5323960R3021

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, 2015 and 2014, 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, 2015 and 2014, 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
February 11, 2016