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UTILITIES COMMISSION

GVNW CONSULTING, INC.

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August 24, 2012

GNR-T-12-06

Ms. Jean Jewell  
Idaho Public Utilities Commission  
472 Washington Street  
P.O. Box 83720  
Boise, ID 83720-0074

RE: 2012 ANNUAL CERTIFICATION OF ELIGIBLE TELECOMMUNICATIONS  
CARRIERS

Dear Jean:

Direct Communications – Rockland (DCR), through its consulting firm GVNW Consulting, Inc., hereby submits its Annual Eligible Telecommunications Carrier Designation Report and Affidavit, in compliance with the requirements set forth in IPUC Order No. 29841.

DCR receives such high cost fund support only for the provision, maintenance, and upgrading of facilities and services for which support is intended. The Company is seeking ETC designation again to continue to receive this support so it can continue those functions into the future. The following ETC annual report information should fulfill the reporting requirements in IPUC Order No. 29841 and will show that the Company is using the funds appropriately. DCR had previously submitted a partial filing and the attached data completes its remaining filing requirements.

If there are any questions concerning this report, or if additional information is required, please contact me by telephone at (719) 594-5800, or by email at [aschein@gvnw.com](mailto:aschein@gvnw.com).

Sincerely,

Andrew J. Schein  
Senior Consultant

Enclosures

cc: Jeremy Smith, DCR

## DIRECT COMMUNICATIONS - ROCKLAND

### Annual Reporting Requirements for Eligible Telecommunications Carriers

#### **Section 1: Eligible Telecommunications Carrier Information:**

Date of ETC Annual Report: 08/24/12

Direct Communications - Rockland  
150 South Main  
P.O. Box 269  
Rockland, ID 83271  
Jeremy Smith, Manager  
208-548-2345  
jeremy@directcom.com

Direct Communications - Rockland (DCR) is an Incumbent Local Exchange Carrier providing basic telephone services. DCR's NECA study area designation (SAC) is 472232. DCR hereby reports the following information as requested in IPUC Order No. 29841.

Number of Idaho Telephone Service Assistance Program (ITSAP) recipients:

**DCR had 65 recipients.**

#### **Section 2: Description of Carrier's Local Usage Plan - Competitive Eligible Telecommunications Carrier (CETC) Only**

**This section is not applicable to DCR (ILEC).**

#### **Section 3: Detailed Outage Information 54.209(a)(2)**

Detailed Outage Information on any outage of at least (30) minutes in duration that affects at least ten percent of the end users, or that could affect access to 9-1-1 must report the following information: (a) the date and time of onset of the outage; (b) a brief description of the outage and its resolution; (c) the particular service affected; (d) the geographic areas affected by the outage; (e) steps taken to prevent a similar situation in the future; (f) the number of customers affected.

**The Company had zero outages as defined in 47 C.F.R. 4.5 of at least 30 minutes and affecting at least ten percent of the end users in the company's service area or a 911 special facility during the reporting period.**

**Section 4: Unfilled Service Requests 54.202 (a) (1) (A)**

The number of requests for service from potential customers within the ETC's service areas that were unfulfilled during the past year and written submission detailing how it attempted to provide service to those potential customers, as set forth in 47 C.F.R.54.202(a)(1)(i).

**As per the requirements set fourth in 47 C.F.R 54.202 (a)(1)(i) the Company had zero unfilled service requests during the reporting period.**

**Section 5: Customer Complaints 54.209(a) (4)**

The number of complaints per 1,000 access lines or handsets.

**The Company was notified by the IPUC of zero formal or informal complaints during the reporting period. The company received twelve complaints from customers during the period with many of them relating to the rural call completion issue.**

**Section 6: Service Quality and Consumer Protection Certification 54.202(a)(3)**

Certification that the ETC is complying with the applicable service quality standards and consumers protection rules; e.g., the CTIA Consumer Code for Wireless.

**The Company certifies that it complies with the IPUC Customer Relations rules IDAPA 31.41.01 and applicable consumer protection and service quality standards. Please see attached Affidavit.**

**Section 7: Ability to Remain Functional in Emergencies Certification 54.201(a)(2)**

Written submission detailing how the carrier is able to function in emergency situations as set forth in 47 C.F.R. & 54.201 (a)(2).

**DCR utilizes battery back-up systems and standby generators in its central offices. This enables the company to sustain a power outage for at least 48 hours. DCR is also part of the Syringa Network that provides a fiber ring through southern Idaho. Being on the Syringa ring provides the company the capability of re-routing traffic and providing continuous service in emergency situations due to damaged facilities.**

**Section 8: Federal USF High-Cost Support Certification 54.313, 54.314**

**Please see attached Affidavit.**

## **Section 9: Two-Year Network Improvement Plan and Progress Report**

### **Two-year Network Improvement Plan**

**The Company's Exhibit No. 1 is a progress report schedule outlining the most recent two-year network improvement plan.**

**The total amount of all federal high cost support received in the previous and current calendar year is identified below.**

**The amount of Federal High Cost Support received in 2011:**

**HCL = \$647,732**

**LSS = 362,784**

**ICLS = 495,330**

**The amount of Federal High Cost Support received through July 1, 2012:**

**HCL = \$281,436**

**LSS = 181,392**

**ICLS = 221,646**

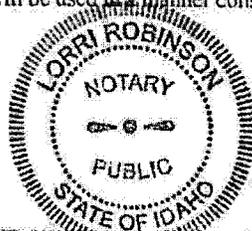
State of IDAHO )  
 ) ss  
County of POWER )

CERTIFICATION BY ELIGIBLE TELECOMMUNICATIONS  
CARRIER OF COMPLIANCE WITH SERVICE QUALITY AND  
CUSTOMER PROTECTION, ABILITY TO REMAIN FUNCTIONAL  
IN EMERGENCIES, AND USE OF FEDERAL HIGH-COST  
SUPPORT.

AFFIDAVIT OF BUSINESS OR CORPORATE OFFICER

The Idaho Public Utilities Commission Order No. 29841 requires that Eligible Telecommunications Carriers certify that it is compliant with applicable service quality standards and consumer protection rules; and ETCs must demonstrate the ability to remain functional in emergencies. In addition, the Commission must file an annual certification with the USAC and the FCC that all federal high-cost support provided to ETCs within the State of Idaho will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. Accordingly, the undersigned states and verifies under oath the following:

1. I am an officer of Direct Communications-Rockland, an eligible telecommunications carrier for receiving federal universal service support under section 214(e) of the Telecommunications Act of 1996 in the state of Idaho.
2. I am familiar with the Company's day-to-day operations in the state of Idaho and with the State's service quality standards and consumer protection rules as set forth in Commission Order No. 29841.
3. Direct Communications-Rockland is complying with applicable service quality standards and consumer protection rules of the Federal Communications Commission and the Idaho Public Utilities Commission.
4. I certify to the Commission that the Company is able to remain functional in emergencies as set forth in Commission Order No. 29841 and in 47 C.F.R. § 54.201(a)(2).
5. I also certify that all federal universal service support funds received by Direct Communications-Rockland during the current calendar year will be used in a manner consistent with section 254(e); that is, for the provision, maintenance, and upgrading of facilities and services for which the support is intended. The company will continue to comply for the period of January 1, 2013, through December 31, 2013, to be eligible for federal universal service fund support.
6. This verification and affidavit is provided to be the Idaho Public Utilities Commission to enable the IPUC to certify to the FCC that federal universal service support received by the eligible carriers in the state will be used in a manner consistent with Section 254(e) of the Telecommunications Act.



Jeremy Smith/Vice President

6/20/12  
Date

SUBSCRIBED AND SWORN in and before me this 20 day of June 2012.

Lorri Robinson

Notary Public for Idaho residing at Rockland

My Commission expires 7-29-2016

ETC ANNUAL REPORT - IPUC (2012)

Exhibit #1

Company: Direct Communications - Rockland  
 Two - Year Network Improvement Plan and Progress Report  
 Capital improvements that will be funded by high-cost support

<b>Year 1: July 1, 2012 - June 30, 2013</b>		Project start date	Project completion date	Estimated Cost of Project
<u>Exchange &amp; Location</u>	<u>Note description of project improvement</u>			
1. Rockland Exchange - Rockland, ID 208-548	Rockland Town Fiber to the Home PH 1	6/1/2013	11/1/2013	\$120,000.00
2. Paris Exchange - Fish Haven, ID 208-945	Canyon Estates Subdivision FTTH	5/1/2012	5/30/2013	\$78,000.00
3. Rockland Exchange, Rockland, ID 208-548	Rockland South to Dry Hollow Rd - Backbone	9/1/2012	12/31/2012	\$84,000.00
4. Rockland Exchange, Rockland, ID 208-548	Rockland South to Dry Hollow Rd - Backbone	3/1/2013	6/30/2013	\$57,000.00
5. All Exchanges - Rockland, Arbon, Paris. ID 208-548 208-335 208-945	Backbone Transport Equipment Upgrade	6/1/2012	12/31/2012	\$120,000.00
6. Paris Exchange - Paris, Liberty, Sharron, ID 208-945	Network Equipment Upgrade (Paris North)	4/1/2012	9/1/2012	\$60,000.00
7. Paris Exchange - Preston, ID 208-945	Preston to Utah State Line - Redundant Fiber Route	4/1/2012	9/30/2012	\$600,000.00

<b>Year 2: July 1, 2013 - June 30, 2014</b>		Project start date	Project completion date	Estimated Cost of Project
<u>Exchange &amp; Location</u>	<u>Note description of project improvement</u>			
1. Rockland Exchange, Rockland, ID 208-548	North Rock Creek Road FTTH	4/1/2013	11/1/2013	\$146,000.00
2. Rockland Exchange - Rockland, ID 208-548	Rockland Town FTTH PH 2	6/1/2013	6/1/2014	\$300,000.00
3. Paris Exchange, Fish Haven, ID 208-945	Aspen Meadows Subdivision FTTH	6/1/2013	11/30/2013	\$50,000.00
4. Rockland Exchange - Rockland, Idaho 208-548	Rockland Fiber to the Home - South Main Line	4/1/2014	12/31/2014	\$300,000.00
5. Rockland Exchange - Rockland, Idaho 208-548	Rockland Fiber to the Home - South Taps	7/1/2014	6/30/2015	\$200,000.00
6. Paris Exchange, Paris, ID 208-945	Paris Town FTTH Phase 1	4/1/2014	4/31/2014	\$300,000.00