



525 Junction Rd
Madison, WI 53717
www.tdstelecom.com

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IDAHO PUBLIC
UTILITIES COMMISSION

GNR-T-12-06

August 30, 2012

Idaho Public Utilities Commission
Commission Secretary
472 West Washington Street
PO Box 83720
Boise, ID 83720-0074

filed via email to Jean Jewell

**Re: Pottlatch Telephone Company, Inc. - Universal Service Certification
47 USC 254(e); 47 CFR § 54.314**

This letter is to request that the Idaho Public Utilities Commission notify the Universal Service Administrative Company (USAC) and the Federal Communications Commission (FCC) that Pottlatch Telephone Company, Inc. d/b/a TDS Telecom is eligible to receive federal high-cost support in accordance with the above-referenced statute and federal rule.

In accordance with the PUC's Order No. 29841, Pottlatch Telephone Company submits the attached information in support of this request.

Any questions or concerns can be directed to Gail Long at 503-656-8399 or gail.long@tdstelecom.com.

Sincerely,

A handwritten signature in cursive that reads "Bruce Schiefelbein by KMS".

Bruce Schiefelbein
Manager - Regulatory Compliance
TDS Telecom
608-664-5455

Attachments

c.c. Gail Long

ELIGIBLE TELECOMMUNICATIONS CARRIER (ETC) ANNUAL RE-CERTIFICATION

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Section 1: Eligible Telecommunication Carrier Information

Date of ETC Annual Report: 8/29/2012

Company Name: Potlatch Telephone Company, d/b/a TDS Telecom

Address: 525 Junction Road
Madison, WI 53717

Company Contact Person/Title: Gail Long - Manager State Government Affairs
Telephone Number: 503-656-8399
Email Address: gail.long@tdstelecom.com

Service Area Code (SAC): 472230

Number of Idaho Telephone Service Assistance Program (ITSAP) recipients (See note): 62

Note: Use number from last report submitted to the ITSAP Administrator

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

ETCs must submit information describing the terms and conditions of any voice telephony service plans offered to Lifeline and ITSAP subscribers, including details on the number of minutes provided as part of the plan, additional charges, if any, for toll calls, and rates for each such plan. To the extent the ETC offers plans to Lifeline subscribers that are generally available to the public, it may provide summary information regarding such plans, such as a link to a public website outlining the terms and conditions of such plan. C.F.R. § 54.202(a)(5).

Description: N/A – Company is incumbent LEC.

Section 3: Detailed Outage Information §54.313(a)(2)

Provide detailed information on any outage, as that term is defined in 47 C.F.R. § 4.5, of at least thirty (30) minutes in duration for each service area in which an ETC is designated for any facilities it owns, operates, leases or otherwise uses that potentially affect (a) at least ten percent of the end users served in a designated service area; or (b) a 9-1-1 special facility, as defined in 47 C.F.R. § 4.5(e). Specifically, the annual report must include information detailing: (a) the date and time of onset of the outage; (b) a brief description of the outage and its resolution; (c) the steps taken to prevent a similar situation in the future; and (f) the number of customers affected. Reporting period is January–December. See Order No. 29841, page 18.

Number of outages: Zero.

Additional outage information: _____

Section 4: Unfulfilled Service Requests §54.313(a)(3)

Provide the number of requests for service from potential customers within the ETC's service area(s) that were unfulfilled in the previous year (January–December). The ETC shall also detail how it attempted to provide service to those potential customers. See Order No. 29841, page 19.

The number of unfulfilled service requests from potential customers within the ETC's service area: Zero.

Additional information: _____

Section 5: Customer Complaints §54.313(a)(4)

Provide the number of complaints per 1,000 handsets or lines for the previous year (January–December).

The number of customer complaints per 1,000 handset or working access lines: Zero.

Additional information: _____

**Section 6: Service Quality and Consumer Protection Certification
§54.313(a)(5)**

Provide certification that the carrier is complying with applicable service quality standards and consumer protection rules.

**Section 7: Ability to Remain Functional in Emergencies Certification
§54.313(a)(6)**

ETCs must demonstrate that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to re-route traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.

Section 8: Additional Voice Rate Data §54.313(h)

All incumbent local exchange carrier recipients of high-cost support must report all of their flat rates for residential local service, as well as state fees as defined pursuant to §54.318(e) of this subpart. Carriers must also report all rates that are below the local urban rate floor as defines in §54.318 of this subpart, and the number of lines for each rate specified. Carriers shall report liens and rates in effect as of June 1.

<u>Exchange</u>	<u>Residential One-Party Rate</u>	<u>State Fees</u>
Troy	\$12.67	Universal Service Fund \$.12
Kendrick/Juliaetta	\$11.75	Universal Service Fund \$.12

The company did not have any rates below the urban rate floor.

Section 9: Federal USF High-Cost Support Certification §54.313, §54.314

Pursuant to FCC regulations, in order for ETCs to continue to receive federal USF, the Commission "must file an annual certification with the USAC and the [FCC] stating that all federal high-cost support provided to such carriers within that State will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended."

NOTE: See Affidavit of Business or Corporate Officer for the above certification requirements.

State of Wisconsin)
County of Dane) ss

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

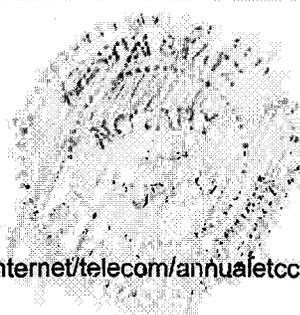
The Idaho Public Utilities Commission Order No. 29841 requires that Eligible Telecommunications Carriers certify that it is compliant with applicable service quality standards and consumer protection rules; and ETCs must demonstrate the ability to remain functional in emergencies. In addition, the Commission 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:

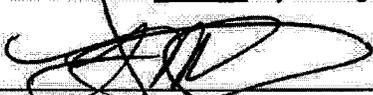
1. I am an officer of Potlatch Telephone Company, Inc., an eligible telecommunications carrier for receiving federal universal service support under section 214(e) of the Telecommunications Act of 1996 in the state of Idaho.
2. I am familiar with the Company's day-to-day operations in the state of Idaho and with the State's service quality standards and consumer protection rules as set forth in Commission Order No. 29841.
3. Potlatch Telephone Company, Inc. 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 Potlatch Telephone Company, Inc. were used in the preceding calendar year and will be used in the new calendar year 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.


Kevin G. Hess
Sr. Vice President
Government & Regulatory Affairs

8/30/12
Date

SUBSCRIBED AND SWORN to before me this 30th day of August 2012.




Kristin M. Statz
Notary Public for Wisconsin, residing at Madison, Wisconsin
My Commission expires: May 24, 2015

Section 10: Two-Year Network Improvement Plan and Progress Report

The annual report must include a progress report on the carrier's two-year service quality improvement plan, including maps detailing its progress toward meeting the plan targets, an explanation of how much universal service support was received and how it was used to improve signal quality, coverage, or capacity, and an explanation regarding any network improvement targets that have not been fulfilled. This information shall be submitted at the wire center level. The annual report must also include an updated two-year network improvement plan indicating plans for future investment.

See *Attachment 1* – for a copy of the Company's two year network improvement plan which includes the financial information relating to operating expenses and capital additions. (We supplied years 2012, 2013 and 2014 for the network plan on Attachment 1).

No new maps have been submitted with this filing, as they are already on file at the Commission in the Company's tariffs.

For ILEC ETCs, like Potlatch Telephone Company, federal high cost support is used to support prior expenditures for ongoing network costs, but the monies received do not cover the entire cost of operating the network. Rather, the support that the Company receives is only a percentage of its costs to provide service. Thus, USF support helps the Company to: (1) maintain affordable rates for local exchange service; and (2) to continue to upgrade its telecommunications facilities and equipment as necessary to meet evolving service requirements and maintain high quality service. The Company's use of USF support is for the provision, maintenance and upgrading of its existing network.

The Company's improvement plan for future investment is to continue to upgrade its telecommunications facilities and equipment as necessary to meet evolving service requirements and maintain high quality service throughout the Company's service area. As an incumbent local carrier, the Company upgrades and replaces facilities and equipment as necessary.

More specifically, minor jobs that aren't capitalized are included in accounts and includes things such as replacement of pedestals, cut cables and other general plant maintenance that work orders are not kept for.

The company reports that projects identified for 2011 have been completed.

Two-Year Network Improvement Plan Format

Please note the budgeting for individual projects for 2013 and 2014 has not yet been completed. The projects included below are for budget year 2012. It is anticipated the company will expend approximately the same amounts for 2013 and 2014 but that is subject to change based on consumer & market demand, competitive response and technology changes.

Year 1: January 1, 2012—December 31, 2012

Wire center: Troy

Description of project improvement(s):

- Line extension for new service – estimated cost \$4,600
- Transport upgrade at DSA 14305 – estimated cost \$1,600
- Replace CO batteries – estimated cost \$22,300

Status: in progress

Project start date: 1/1/2012 varies depending on schedule

Project completion date: varies depending on schedule, all projects should be completed by 12/31/2012

Estimated cost of project: see above

Additional comments: see note above

Year 1: January 1, 2012—December 31, 2012

Wire center: Kendrick

Description of project improvement(s):

- Chevy AWD Van with Adrian Up-fit – estimated cost \$37,000
- High speed circuit for Gritman Medical – estimated cost \$2,500

Status: in progress

Project start date: 1/1/2012 varies depending on schedule

Project completion date: varies depending on schedule, all projects should be completed by 12/31/2012

Estimated cost of project: see above

Additional comments: see note above

Year 1: January 1, 2012—December 31, 2012

Wire center: Juliaetta

Description of project improvement:

- Pole washout – estimated cost \$4,300
- Replace bad cable at Arrow Junction – estimated cost \$2,500

Status: in progress

Project start date: 1/1/2012 varies depending on schedule

Project completion date: varies depending on schedule, all projects should be completed by 12/31/2012

Estimated cost of project: see above

Additional comments: see note above

Please note the budgeting for individual projects for 2013 & 2014 has not yet been completed. It is anticipated the company will expend approximately the same amounts for 2013 and 2014 for capitol projects but that is subject to change based on consumer & market demand, competitive response and technology changes. The numbers given below for minor routine maintenance projects is based on historical data.

Year 2: January 1, 2013—December 31, 2013

Wire center: Troy

Description of project improvement:

- Minor Routine Maintenance Project – estimated cost: \$1,400

Status: Pending

Project start date: Estimated 1/1/2013

Project completion date: Estimated 12/31/2013

Estimated cost of project: see above

Additional comments: see note above

Year 2: January 1, 2013—December 31, 2013

Wire center: Kendrick

Description of project improvement:

- Minor Routine Maintenance Project – estimated cost: \$1,200

Status: Pending

Project start date: Estimated 1/1/2013

Project completion date: Estimated 12/31/2013

Estimated cost of project: see above

Additional comments: see note above

Year 2: January 1, 2013—December 31, 2013

Wire center: Juliaetta

Description of project improvement:

- Minor Routine Maintenance Project – estimated cost: \$900

Status: Pending

Project start date: Estimated 1/1/2013

Project completion date: Estimated 12/31/2013

Estimated cost of project: see above

Additional comments: see note above

*This report is intended to be a forward-looking view of a carrier's network improvement plan. Please do not provide information for any months earlier than those listed above.

Note: The ETC may wish to submit the Two-Year Network Improvement Plan as "confidential information." If so, please follow the IPUC Rules of Procedure for Information Exempt From Public Review—Definitions—Form—Procedures. See IDAPA 31.01.01, Rule 67.

Section 11: ETC References and Reporting Instructions

ETC Designation, Reporting, and Certification Requirements.

Statutory Designation Requirements:

1. **Common Carrier**—ETC applicant must be a "common carrier" as defined in 47 U.S.C. § 153(10).
2. **Provide the Universal Services** set forth in 47 C.F.R. § 54.101(a).
3. **Lifeline Advertisement.** See 47 U.S.C. § 214(e)(1)(B).
4. **Public Interest.** See 47 C.F.R. § 54.202(c).
5. **Tribal Notification.** See 47 C.F.R. § 54.202(d).

Additional Eligibility Requirements (Commission Order No. 29841):

1. **The Commitment and Ability to Provide Supported Services.**
2. **The Ability to Remain Functional in Emergencies.**
3. **A Commitment to Consumer Protection and Service.** Wireline companies must follow Idaho Customer Relation Rules IDAPA 31.41.01. Wireless companies must agree and comply with the Cellular Telecommunications and Internet Association's Consumer Code for Wireless Service (CTIA Code).
4. **Description of a local usage plan comparable to that of the Incumbent local exchange carrier.**

Reporting Requirements (Commission Order No. 29841):

1. **Two-Year Network Improvement Plan & Progress Report (January 1, 2012—December 31, 2013)**
2. **Outages**
3. **Unfulfilled Service Requests**
4. **Customer Complaints**
5. **Service Quality and Consumer Protection certification**
6. **Ability to remain functional in an emergency certification**

Use of Federal High Cost Fund Certification Requirement

References and Filing Instructions

Links:

FCC Report and Order 05-46

Idaho Commission Order No. 29841

Idaho Telephone Customer Relations Rules: IDAPA 31.41.01

IPUC Rules of Procedure: Information Exempt From Public Review—Definitions—Form—Procedures.

Instructions:

Company documents and forms may be attached to comply with any of the reporting sections.

To comply with the certification requirements, the company may use the sample affidavit attached as "Example A" or one of its own. The affidavit must certify the company's: 1) appropriate use of federal universal support funds, 2) compliance with service quality and customer protection provisions, and, 3) ability to remain functional in an emergency.

Due Date:

September 1 of each year. The 2012 report is due by 5PM, MDT on **September 3, 2012.**

Submit one (1) copy to:

Idaho Public Utilities Commission
Commission Secretary
472 W. Washington
PO Box 83720
Boise, Idaho 83720-0074

Or email to:

jean.jewell@puc.idaho.gov

Questions/Comments:

Grace Seaman
IPUC Utilities Analyst
Phone: 208.334.0352
FAX: 208.334.3762
Email: grace.seaman@puc.idaho.gov