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years COUNTS  
1913-2013

June 26, 2014

**VIA FEDX - CONFIDENTIAL FILING**

Ms. Jean Jewell, Commission Secretary  
Idaho Public Utilities Commission  
472 W. Washington Street  
Boise, Idaho 83720-0074

GNR-T-14-01

Re: Farmers Mutual Telephone Company FCC Form 481 - Carrier Annual Reporting Data  
Collection Form, in Compliance with 47 C.F.R. §§ 54.313 and 54.422

Dear Ms. Jewell:

On behalf of Farmers Mutual Telephone Company (the Company), attached is a copy of the  
Company's FCC Form 481 - Carrier Annual Reporting Data Collection Form, in compliance with 47  
C.F.R. §§ 54.313 and 54.422.

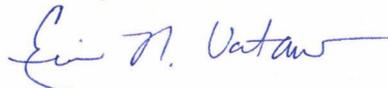
The attached report is provided to the Idaho Public Utilities Commission (PUC) in accordance  
with 47 C.F.R. §§ 54.313(i) and 54.422(c).

Redacted financial information is included as an attachment to the FCC Form 481. A hard copy of  
the non-redacted confidential financial information that has been filed with the Federal  
Communications Commission (FCC) subject to a Protective Order, issued by the FCC on  
November 16, 2012, and the FCC's confidentiality rules, is also being submitted to the PUC, via  
overnight delivery, as confidential information that is exempt from disclosure under the Idaho  
Public Utilities Commission Rules of Procedure, Rule 67. The information is proprietary in nature  
and is not generally available to the public through regulatory disclosure or other means, and  
would give an advantage to a competitor if made public.

The Affidavit of Business or Corporate Officer is also attached.

If you have any questions or need additional information, please contact me at 209-955-6116 or via  
e-mail at [Eric.Votaw@mossadams.com](mailto:Eric.Votaw@mossadams.com).

Sincerely,



Eric N. Votaw, Senior Manager  
For Moss Adams

Enclosures

cc: Daniel Greig - General Manager Farmers Mutual Telephone Company

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**CONFIDENTIAL FILING**

June 26, 2014

**VIA OVERNIGHT DELIVERY**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

RE: **Confidential Financial Information Subject to Protective Order in WC Docket Nos. 10-90, 07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WT Docket No. 10-208, Before the Federal Communications Commission**

Dear Ms. Dortch:

Farmers Mutual Telephone Company ("FMTC"), a privately-held rate of return carrier receiving high cost support, has electronically submitted FCC Form 481 to the Commission with redacted Line 3005 financial data and five-year build out plan in Line 100. FMTC respectfully provides the Commission with its confidential financial data so that all its reporting obligations are satisfied.

FMTC, by its authorized representative, respectfully submits confidential information in compliance with 47 C.F.R. §§ 54.313 and 54.422, under seal, as specified with the Protective Order adopted on November 16, 2012 ("Protective Order") and also in conjunction with 47 C.F.R. §§ 0.457 and 0.459. Further justification for this confidential filing is identified below in accordance with 47 C.F.R. §0.459(b).

FMTC requests confidential treatment of certain information submitted with its annual reporting requirements as a privately-held rate of return carrier and high-cost recipient in Docket No. 10-90. The confidential information is required by 47 C.F.R. § 54.313(f)(2) and includes detailed financial information that is competitively sensitive. Disclosure of this confidential information would have a substantial negative impact on FMTC. Such information would not normally be made available to the public for inspection because of the financial information and should be afforded confidential treatment under both 47 C.F.R. §§ 0.457 and 0.459.

47 C.F.R. § 049(b): Information provided by FMTC includes specific information related to financial data and is subject to protection for the following reasons:

**47 C.F.R. § 0459(b)(1) Identification of the specific information for which confidential treatment is sought:**

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FMTC requests that all financial data be treated on a confidential basis under Exemption 4 of the Freedom of Information Act. FMTC maintains this information is confidential, competitively sensitive data not normally made available to the public. Release of this information would have a substantial negative competitive impact on FMTC. The non-redacted version of the cover letter for FMTC's submission and each page of the file containing confidential information is marked, "CONFIDENTIAL FINANCIAL INFORMATION SUBJECT TO PROTECTIVE ORDER IN WC DOCKET NOS. 10-90, 07-135, 05-337, 03-109, CC DOCKET NOS. 01-92, 96-45, GN DOCKET NO. 09-51, WT DOCKET NO. 10-208, BEFORE THE FEDERAL COMMUNICATIONS COMMISSION."

47 C.F.R. § 0459(b)(2) Identification of the Commission proceeding in which the information was submitted:

The information is being submitted in compliance with 47 C.F.R. § 54.313(f)(2) and is to be filed in WC Docket No. 10-90. Privately held rate of return carriers that receive high-cost support must complete the FCC Form 481 to include a full and complete annual support of the company's financial condition and operations as of the end of the preceding fiscal year (sections of which FMTC is requesting be afforded confidential treatment).

47 C.F.R. § 0459(b)(3) Explanation of the degree to which the information is commercial or financial or contains a trade secret or is privileged:

The information designated as confidential is detailed financial information including a balance sheet, income statement, cash flow statement that is competitively sensitive information not normally released to the public. Release of any of this commercial or financial information would have a substantial negative competitive impact on FMTC.

47 C.F.R. § 0459(b)(4)&(5) Explanation of the degree to which the information concerns a service that is subject to competition and how disclosure of the information could result in substantial competitive harm:

This type of commercial and financial information is generally not subject to routine public inspection under the Commission's rules (47 C.F.R. § 0.457(d)), demonstrating that the Commission already anticipates that the release of this type of information likely would produce competitive harm. Release of the information designated as confidential would allow competitors to become aware of sensitive proprietary information regarding the operation of FMTC's business and would cause FMTC substantial competitive harm.

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47 C.F.R. § 0459(b)(6)&(7) Identification of measures taken by the Company to prevent unauthorized disclosure: availability of the information to the public and extent of any previous disclosure of the information to third parties;

FMTC treats and has treated the non-public information included in this submission as confidential and has protected it from disclosure to parties outside the Company. Any financial information required to be submitted to a state regulatory authority has been filed as confidential information, not available to the public, in accordance with state rules and/or statutes.

47 C.F.R. § 0459(b)(8) Justification of the period during which the Company asserts that material should not be available for public disclosure;

FMTC cannot determine any date on which this information should not be considered confidential. However FMTC does believe that this information should be treated confidential for a minimum of 10 years.

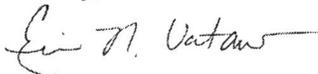
47 C.F.R. § 0459(b)(8) Other information the Company believes may be useful in assessing whether its request for confidentiality be granted;

Under applicable Commission rules and court rulings, the information designated by the Company as confidential should be withheld from public disclosure. Exemption 4 of the Freedom of Information Act protects information that is commercial or financial in nature; obtained from a person outside government; and privileged or confidential.

As specified in the Protective Order, two copies of the redacted confidential information are being filed simultaneously with the non-redacted confidential information. The redacted information for this filing and each page of the file where confidential information has been omitted is marked "REDACTED - FOR PUBLIC INSPECTION"

Please feel free to contact me with any questions regarding this particular matter.

Sincerely,



Eric N. Votaw, Senior Manager  
For Moss Adams LLP

Enclosures

.cc Mr. Charles Tyler, FCC Telecommunications Access Policy Division  
Daniel Greig - General Manager Farmers Mutual Telephone Company

State of Idaho )  
County of Payette ) 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 Farmers Mutual Telephone Company, 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. Farmers Mutual Telephone Company 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 Farmers Mutual Telephone Company 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, 2015, through December 31, 2015, 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.

David E. Berg  
Name/Title  
6/27/2014  
Date

SUBSCRIBED AND SWORN to before me this 27<sup>th</sup> day of June, 2014

JACKIE JERMAN  
NOTARY PUBLIC  
STATE OF IDAHO

Jackie Jerman  
Notary Public for Idaho, residing at Fruitland  
My Commission expires 10-25-2018