*INLAND TELEPHONE COMPANY*
*Corporate Offices*

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*P.O. Box 171*
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INLAND TELEPHONE

January 27, 2015

***Via email in .PDF format to jean.jewell@puc.idaho.gov***

Idaho Public Utilities Commission
Commission Secretary
472 W. Washington
P.O. Box 83720
Boise, ID 83720-0074

Re: Pursuant to IPUC Order No. GNR-T-15-01
2015 Federal Lifeline Certification and Reporting
Pursuant to 47 C.F.R. § 54.416(b)

Dear Commission Secretary:

Pursuant to 47 C.F.R. § 54.416(b), accompanying this letter for filing with the Idaho Public Utilities Commission ("Commission") is a copy of the completed Federal Communications Commission ("FCC") Form 555 (Annual Lifeline Eligible Telecommunications Carrier Certification Form), for the reporting year ended December 31, 2014. The FCC Form 555 has been submitted pursuant to the FCC's Lifeline program rules and WC Docket No. 14-171 by Inland Telephone Company ("Company")(SAC 472423) to the Universal Service Administrative Company and the FCC with respect to the Company's Lifeline service subscribers residing in the State of Idaho.

Please let us know if the Commission has any questions regarding the information presented on the accompanying form.

Sincerely,

James K. Brooks
Treasurer/Controller

Accompanying document

FCC Form 555
November 2014

Approved by OMB
3060-0819

**Annual Lifeline Eligible Telecommunications Carrier Certification Form**
All carriers must complete all or portions of all sections
Form must be submitted to USAC and filed with the Federal Communications Commission

# IMPORTANT: PLEASE READ INSTRUCTIONS FIRST

***Deadline: January 31st (Annually)***

472423
Study Area Code (SAC)
*(An Eligible Telecommunications Carrier (ETC) must provide a certification form for **each SAC** through which it provides Lifeline service).*

Idaho
State

Inland Telephone Company
ETC Name

Inland Networks
DBA, Marketing or Other Branding Name
*(If same as ETC name, list "N/A" Do not leave blank)*

Western Elite Incorporated Services
Holding Company Name
*(If same as ETC name, list "N/A" Do not leave blank)*

**Does the reporting company have affiliated ETCs?** Yes ☑ No ☐

*Provide a list of all ETCs that are affiliated with the reporting ETC, using page 4 and additional sheets if necessary. Affiliation shall be determined in accordance with Section 3(2) of the Communications Act. That Section defines "affiliate" as "a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person." 47 U.S.C. § 153(2). See also 47 C.F.R. § 76.1200.*

| Affiliated ETC's SAC | Affiliated ETC's Name |
|---|---|
| See list of Affiliated ETC's | See list of Affiliated ETC's |

For purposes of this filing, an officer is an occupant of a position listed in the article of incorporation, articles of formation, or other similar legal document. An officer is a person who occupies a position specified in the corporate by-laws (or partnership agreement), and would typically be president, vice president for operations, vice president for finance, comptroller, treasurer, or a comparable position. If the filer is a sole proprietorship, the owner must sign the certification.

**Section 1:** **Initial Certification** *All ETCs must complete this section*

I certify that the company listed above has certification procedures in place to:

A) Review income and program-based eligibility documentation prior to enrolling a consumer in the Lifeline program, and that, to the best of my knowledge, the company was presented with documentation of each consumer's household income and/or program-based eligibility prior to his or her enrollment in Lifeline; and/or

B) Confirm consumer eligibility by relying upon access to a state database and/or notice of eligibility from the state Lifeline administrator prior to enrolling a consumer in the Lifeline program.

I am an officer of the company named above. I am authorized to make this certification for the Study Area Code listed above.

**Initial** _____

## Section 2: Annual Recertification

*Do not leave empty blocks. If an ETC has nothing to report in a block, enter a zero.*

| A | B | C | D | E = (A – B – C – D) |
|---|---|---|---|---|
| **Number of subscribers claimed on February FCC Form 497 of current Form 555 calendar year** *(February data month)* | **Number of lines claimed on February FCC Form 497 of current Form 555 calendar year provided to wireline resellers** | **Number of subscribers claimed on the February FCC Form 497 that were initially enrolled in the current Form 555 calendar year** *(These subscribers did not have Lifeline service prior to January 1 of the current 555 calendar year.)* | **Number of subscribers de-enrolled prior to recertification attempt by either the ETC, a state administrator, access to an eligibility database, or by USAC** | **Number of subscribers ETC is responsible for recertifying for current Form 555 calendar year** |
| 3 | 0 | 0 | 0 | 3 |

### Recertification Results:

| F | G | H = (F-G) | I | J = (H+I) |
|---|---|---|---|---|
| **Number of subscribers ETC contacted directly to recertify eligibility through attestation** | **Number of subscribers responding to ETC contact** | **Number of non-responding subscribers** | **Number of subscribers responding that they are no longer eligible** *(This should be a subset of Block G.)* | **Number of subscribers de-enrolled or scheduled to be de-enrolled as a result of non-response or response of ineligibility from ETC recertification attempt** |
| | | | | 0 |

| K | L |
|---|---|
| **Number of subscribers whose eligibility was reviewed by state administrator, ETC access to eligibility database, or by USAC** | **Number of subscribers de-enrolled or scheduled to be de-enrolled as a result of finding of ineligibility by state administrator, ETC access to eligibility database, or USAC** |
| 3 | 0 |

**Note:** *If any subscriber was reviewed by an ETC accessing a state database or by a state administrator and subsequently contacted directly by the ETC in an attempt to recertify eligibility, those subscribers should be listed in Blocks F through J as appropriate and not in Blocks K and L. As a result, all subscribers subject to recertification who were not de-enrolled prior to the recertification attempt must be accounted for in Block F or Block K.*

***The total of Block F and Block K should equal the number reported in Block E.***

### Certification:

*Based on the data entered above, initial the certification(s) below that apply. Both Certification A and B may apply depending on the recertification procedures in place for the SAC reporting on this form. If Certification C applies, neither Certification A nor B may apply.*

**A.)** I certify that the company listed above has procedures in place to recertify the continued eligibility of all of its Lifeline subscribers, and that, to the best of my knowledge, the company obtained signed certifications from all subscribers attesting to their continuing eligibility for Lifeline. Results are provided in the chart above in Blocks F through J. I am an officer of the company named above. I am authorized to make this certification for the SAC listed above.

**Initial** _____

**AND/OR**

**B.)** I certify that the company listed above has procedures in place to recertify consumer eligibility by relying on: Community Action Partnership Association (CAPA) of Idaho and USAC NLAD. Results are provided in the chart above in Blocks K through L. I am an officer of the company named above. I am authorized to make this certification for the SAC listed above.

**Initial** _____

**OR**

**C.)** I certify that my company did not claim federal low income support for any Lifeline subscribers for the February Form 497 data month for the current Form 555 calendar year. I am an officer of the company named above. I am authorized to make this certification for the SAC listed above.

**Initial** _____

## Section 3: De-enroll Percentage

*Using the data entered in Section 2, complete the chart below to find the percentage of subscribers de-enrolled for this ETC.*

| M = (F+K) | N = (J+L) | O = ((N ÷ M) * 100) |
|---|---|---|
| **Number of subscribers that the ETC attempted to recertify directly or through a state administrator, ETC access to a state database, or by USAC** ***(This should equal the number reported in Block E)*** | **Number of subscribers de-enrolled or scheduled to be de- enrolled as a result of non-response or ineligibility** | **Percentage of subscribers de-enrolled or scheduled to be de-enrolled as a result of ineligibility or non-response** |
| 3 | 0 | 0.00 |

## Section 4: Pre-Paid ETCs

*All ETCs must complete the appropriate check-box; pre-paid ETCs must complete all of Section 4. Pre-paid ETCs generally do not assess or collect a monthly fee from their Lifeline subscribers. ETCs that only assess a fee but do not collect such fees are pre-paid ETCs and must complete the chart below.*

**Is the ETC Pre-Paid?** Yes ☐ No ☑

*If Yes, record the number of subscribers de-enrolled for non-usage by month in Block Q below.*

| P | Q |
|---|---|
| Month | Subscribers De-Enrolled for Non-Usage |
| January | |
| February | |
| March | |
| April | |
| May | |
| June | |
| July | |
| August | |
| September | |
| October | |
| November | |
| December | |
| Total Subscribers | |

### Signature Block

By signing below, I certify that the company listed above is in compliance with all federal Lifeline certification procedures. I am an officer of the company named above. I am authorized to make this certification for the Study Area Code (SAC) listed above.

Signed,

Signature of Officer

James K. Brooks, Treasurer
Printed Name and Title of Officer

jbrooks@inlandnet.com
Email Address of Officer

January 27, 2015
Date

James K. Brooks
Person Completing This Certification Form

(509) 649-2211
Contact Phone Number

# Affiliated ETCs

| SAC | Name |
|---|---|
| 522423 | Inland Telephone Company (d/b/a Inland Networks) |
| 479007 | Inland Cellular LLC (d/b/a Inland Cellular) |
| 529003 | Inland Cellular LLC (d/b/a Inland Cellular) |
| 529004 | Inland Cellular LLC (d/b/a Inland Cellular) |