

INLAND TELEPHONE COMPANY
Corporate Offices

103 S. 2nd St.
P.O. Box 171
Roslyn, WA 98941

INLAND
TELEPHONE

Telephone: (509) 649-2211
Fax: (509) 649-3300

June 30, 2015

Via electronic filing to: jean.jewell@puc.idaho.gov

Ms. Jean Jewell
Commission Secretary
Idaho Public Utilities Commission
472 West Washington Street
Boise, Idaho 83720

RE: 2014 Eligible Telecommunications Carrier (ETC) Annual Reporting
Requirements with the IPUC

Dear Ms. Jewell:

Inland Telephone Company ("the Company") hereby provides copies to the Idaho Public Utilities Commission ("Commission") of the filing of the FCC Form 481 that was made to the Federal Communications Commission ("FCC") and the Universal Service Administrative Corporation ("USAC") for carriers designated as an Eligible Telecommunications Carrier, in accordance with 47 U.S.C. 54.313 and 54.422.

I have also included the signed Affidavit pursuant to Commission Order 29841. Company, Study Area Code 472423, is a rural incumbent local exchange carrier (ILEC) as designated by the FCC, and is eligible to receive federal universal service high-cost support pursuant to the Code of Federal Regulations ("CFR"), Title 47, Sections 54.301, 54.305, and Part 36, sub-part F.

Please review the attached filing and include Company in your Annual Use Certification Letter to USAC and the FCC. If you have any questions, do not hesitate to contact me directly.

Sincerely,



James K. Brooks
Treasurer/Controller

Enclosures

**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	472423
<015> Study Area Name	INLAND TEL-ID
<020> Program Year	2016
<030> Contact Name: Person USAC should contact with questions about this data	James K. Brooks
<035> Contact Telephone Number: Number of the person identified in data line <030>	5096492211 ext.
<039> Contact Email Address: Email of the person identified in data line <030>	jbrooks@inlandnet.com

ANNUAL REPORTING FOR ALL CARRIERS	54.313	54.422
	Completion Required	Completion Required

(check box when complete)

<100> Service Quality Improvement Reporting	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<200> Outage Reporting (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210> <input checked="" type="checkbox"/> <-- check box if no outages to report		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<300> Unfulfilled Service Requests (voice)	0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<310> Detail on Attempts (voice)	<div style="border: 1px solid black; height: 40px; width: 100%;"></div> (attach descriptive document)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<320> Unfulfilled Service Requests (broadband)	0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<330> Detail on Attempts (broadband)	<div style="border: 1px solid black; height: 40px; width: 100%;"></div> (attach descriptive document)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<400> Number of Complaints per 1,000 customers (voice)			
<410> Fixed	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420> Mobile	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<430> Number of Complaints per 1,000 customers (broadband)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<440> Fixed	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<450> Mobile	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<500> Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510> <div style="border: 1px solid black; padding: 2px;">150630 AFFIDAVIT OF OFFICER CONTAINING CERTIFICATIONS.pdf, 150222 802299 ITC CPNI CERT AND OP PROC.pdf</div>	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600> Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<div style="border: 1px solid black; padding: 2px;">150629 472423 EMERGENCIES CERTIFICATION.pdf</div>	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610>			
<700> Company Price Offerings (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<710> Company Price Offerings (broadband)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<800> Operating Companies and Affiliates	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900> Tribal Land Offerings (Y/N)?	<input checked="" type="radio"/> <input type="radio"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1000> Voice Services Rate Comparability Certification	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1010> <div style="border: 1px solid black; padding: 2px;">150630 472423 VOICE SERVICES RATE COMPARABILITY CERTIFICATION.pdf</div>	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1100> Certify whether terrestrial backhaul options exist (Yes or No)	<input checked="" type="radio"/> <input type="radio"/> (if not, check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1110>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1200> Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000>	(check to indicate certification)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<2005>	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet

<3000>	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<3005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

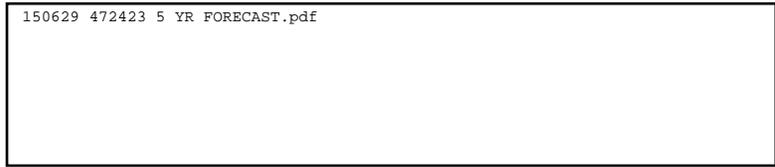
(100) Service Quality Improvement Reporting Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	472423
<015> Study Area Name	INLAND TEL-ID
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	James K. Brooks
<035> Contact Telephone Number - Number of person identified in data line <030>	5096492211 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	jbrooks@inlandnet.com

<110> Has your company received its ETC certification from the FCC? If your answer to Line <110> is yes, do you have an existing §54.202(a) "5	(yes / no) <input type="radio"/> <input checked="" type="radio"/>
<111> year plan" filed with the FCC?	(yes / no) <input type="radio"/> <input type="radio"/>

If your answer to Line <111> is yes, then you are required to 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.

<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.



Name of Attached Document

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.

<113> Maps detailing progress towards meeting plan targets	No
<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	No
<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

No
Yes
Yes
No
Yes
Not Applicable

**(900) Tribal Lands Reporting
Data Collection Form**

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

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<015>	Study Area Name	INLAND TEL-ID
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<039>	Contact Email Address - Email Address of person identified in data line <030>	jbrooks@inlandnet.com

<910> Tribal Land(s) on which ETC Serves

Lenore exchange - Nez Perce Tribe

<920> Tribal Government Engagement Obligation

150630 472423 TRIBAL ENGAGEMENT STATEMENT.pdf

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
Not Applicable
Not Applicable
Not Applicable
Not Applicable
Yes
Not Applicable

(1100) No Terrestrial Backhaul Reporting 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>	jbrooks@inlandnet.com

<1120> Please confirm whether terrestrial backhaul options exist within the supported area pursuant to § 54.313(g) (Yes, No).

<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

140929 APPLICATION - LIFELINE CERT.pdf, 150127 472423 FCC-Form-555.pdf

Name of Attached Document

<1220> Link to Public Website HTTP inlandnet.com

“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	472423
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Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental Connect America Phase I support, frozen 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}
- <2011a> 3rd Year Certification {47 CFR § 54.313(b)(1)ii}
- <2011b> Attachment {47 CFR § 54.313(b)(1)iii}

Name of Attached Document(s) Listing Required Information

Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)}

- <2012> 2013 Frozen Support Calculation {47 CFR § 54.313(c)(1)}
- <2013> 2014 Frozen Support Calculation {47 CFR § 54.313(c)(2)}
- <2014> 2015 Frozen Support Calculation {47 CFR § 54.313(c)(3)}
- <2015> 2016 and future Frozen Support Calculation {47 CFR § 54.313(c)(4)}

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)}

- <2017> 3rd year Broadband Service Certification
- <2018> 5th year Broadband Service Certification
- <2019> Interim Progress Certification
- <2020> Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

- <2021> Interim Progress Community Anchor Institutions

Name of Attached Document(s) Listing Required Information

(3000) Rate Of Return Carrier Additional Documentation	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010> Study Area Code	472423
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CHECK the boxes below to note compliance on its 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.

(3010) **Progress Report on 5 Year Plan**
Milestone Certification (47 CFR § 54.313(f)(1)(i))

Name of Attached Document Listing Required Information

(3011) Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

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

Name of Attached Document Listing Required Information

(3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2)) (Yes/No) Yes No

(3014) If yes, does your company file the RUS annual report (Yes/No) Yes No

Please check these boxes to confirm that the attached document(s), 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) for 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

150623 2014 INLAND RUS OP REPORT FORM 479.pdf

Name of Attached Document Listing Required Information

(3018) If the response is no on line 3014, Is your company audited? (Yes/No) 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

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

(3021) Management letter and 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

(3000) Rate Of Return Carrier Additional Documentation (Continued)

FCC Form 481

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

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Financial Data Summary

(3027) Revenue	4968903
(3028) Operating Expenses	5052182
(3029) Net Income	119126
(3030) Telephone Plant In Service(TPIS)	27004739
(3031) Total Assets	15004348
(3032) Total Debt	6440072
(3033) Total Equity	6206194
(3034) Dividends	0

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: INLAND TEL-ID	
Signature of Authorized Officer: CERTIFIED ONLINE	Date 06/30/2015
Printed name of Authorized Officer: James Brooks	
Title or position of Authorized Officer: Treasurer/Controller	
Telephone number of Authorized Officer: 5096492211 ext.	
Study Area Code of Reporting Carrier: 472423	Filing Due Date for this form: 07/01/2015
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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<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	James K. Brooks
<035>	Contact Telephone Number - Number of person identified in data line <030>	5096492211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jbrooks@inlandnet.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	
<p>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.</p>	
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: ext.	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
<small>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.</small>	

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	
<p>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.</p>	
Name of Reporting Carrier:	
Name of Authorized Agent or Employee of Agent:	
Signature of Authorized Agent or Employee of Agent:	Date:
Printed name of Authorized Agent or Employee of Agent:	
Title or position of Authorized Agent or Employee of Agent:	
Telephone number of Authorized Agent or Employee of Agent: ext.	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
<small>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.</small>	

Attachments

ANNUAL SECTION 64.2009(e) CERTIFICATION
EB Docket No. 06-36

Annual § 64.2009(e) CPNI Certification for 2014

Dated: February 22, 2015

Company: Inland Telephone Company

Form 499 Filer ID Number: 802299

Name of Signatory: James K. Brooks

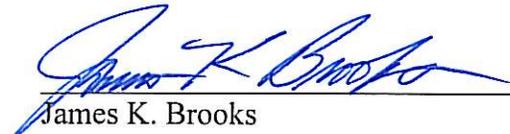
Title of Signatory: Treasurer/Controller

I, James K. Brooks, certify that I am a duly authorized officer of Inland Telephone Company ("Inland" hereafter) and, acting as an agent of Inland, that I have personal knowledge that Inland has established operating procedures that are adequate to ensure compliance with the Customer Proprietary Network Information ("CPNI") rules of the Federal Communications Commission ("Commission"), codified at 47 C.F.R. Part 64 Subpart U, implementing Section 222 of the Communications Act of 1934, as amended.

Accompanying this certification is a statement explaining how Inland's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules.

Inland has not taken any actions (proceedings instituted or petitions filed by Inland at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. During the calendar year ended December 31, 2014, Inland did not acquire first-hand any information that it has identified as being information with respect to the processes pretexters are using to attempt to access CPNI.

Inland has not received any customer complaints in the past year concerning the unauthorized release of CPNI.



James K. Brooks
Treasurer/Controller

**STATEMENT REGARDING OPERATING PROCEDURES
IMPLEMENTING 47 C.F.R. PART 64 SUBPART U
GOVERNING USE OF
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI)
MARCH 1, 2015**

The following statement explains how the operating procedures of Inland Telephone Company (“Inland” or “Company”) ensure that it is in compliance with the Commission’s CPNI rules, as codified at 47 C.F.R. Part 64 Subpart U (§§ 64.2001-64.2011) and is relevant to calendar year 2014. Except as otherwise indicated, the following applies with respect to the Commission’s rules in effect both before and after the December 8, 2007 effective date of the Commission’s April 2, 2007 Report and Order in CC Docket No. 96-115. *See* FCC 07-22 (rel. Apr. 2, 2007); Public Notice, DA 07-4915 (rel. Dec. 6, 2007). This statement covers calendar year 2014.

I. Use of customer proprietary network information without customer approval.

A. Inland may use, disclose, or permit access to CPNI for the purpose of providing or marketing service offerings among the categories of service to which the customer already subscribes from Inland, without customer approval.

B. Inland may not use, disclose, or permit access to CPNI to market to a customer, service offerings that are within a category of service to which the subscriber does not already subscribe from Inland, unless Inland has customer approval to do so, except as described in Section I.C.

(1) Inland may use, disclose or permit access to CPNI derived from their provision of local exchange service or interexchange service, without customer approval, for the provision of CPE and information services, such as call answering, voice mail or messaging, voice storage and retrieval services, and fax storage and retrieval services.

(2) Inland may not use, disclose or permit access to CPNI to identify or track customers that call competing service providers except for CPNI made available to other telecommunications carriers pursuant to tariffed or detariffed billing and collection arrangements and billing and collection services provided pursuant thereto. The Company does not sell CPNI to any third-party for any purpose.

C. Inland may use, disclose, or permit access to CPNI, without customer approval, as follows:

(1) Inland may use, disclose, or permit access to CPNI, in its provision of inside wire installation, maintenance, and repair services.

(2) Inland may use CPNI to market services formerly known as adjunct-to-basic services, such as, but not limited to, speed dialing, computer-provided directory

assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller I.D., call forwarding, and certain Centrex features.

D. Inland may use, disclose, or permit access to CPNI to protect Inland's rights or property; to protect its users and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, Inland's services; and to render, provision, bill or collect for services.

Inland provides local exchange telephone service and access to long distance service providers in six exchanges in the states of Idaho and Washington. Inland's operating procedures comply with the above requirements and include, but are not limited to, the provisions described below. The Company does not engage in any outbound telemarketing. Outbound print marketing, if any, that may be distributed by the Company by mail is addressed to all subscribers or customers within the applicable geographic area, zip code(s) and/or telephone number prefix(es), without regard to the specific services that the subscriber or customer receives, or does not receive, from the Company and/or the Company's affiliates. Under Company policy, none of the Company's affiliates is permitted to use any CPNI of the Company for any outbound telemarketing or outbound print marketing.

Moreover, the Company does not use any CPNI for any inbound marketing of services that are not within a category of service (i.e., local and interexchange) to which the customer already subscribes from the Company and/or one or more of the Company's affiliates. The Company does not sell, or provide access to any third party to, any of the Company's CPNI for purposes of marketing the services of the Company or of any of its affiliates, other than as permitted without prior customer approval with respect to the Company's affiliates. Except for CPNI made available to other telecommunications carriers pursuant to tariffed or detariffed billing and collection arrangements and billing and collection services provided pursuant thereto, and pursuant to Commission-mandated carrier change procedures, the Company does not provide CPNI to any third-party for any purpose.

The Company, its employees and agents may make such other uses and disclosures of, and permit access to, CPNI without customer approval as are permitted by applicable statute, rule, regulation or order. Such uses, disclosures or access may include those authorized by Sections 222(c) and (d) of the Communications Act of 1934, as amended, by Section 64.2005 of the Commission's rules and by orders of the Commission.

Except as set forth above, the Company does not provide any CPNI to any governmental entity, or to any other third party, other than: pursuant to subpoena or other lawful process or with the subscriber's prior written consent, or in accordance with the authentication and other requirement described at Section IV below and in the FCC's rules, as a result of a person representing himself or herself to be the subscriber (or the subscriber's duly authorized agent) and having confirmed his or her identity or authority by providing to the Company appropriate identifying information (such as Social Security Number, driver's license number, mother's maiden name, user name or password, as appropriate or otherwise required).

II. Approval required for use of customer proprietary network information.

A. Inland may obtain customer approval through written, oral or electronic methods.

(1) Inland does not seek or obtain oral approval, and therefore does not bear the burden of demonstrating that such approval has been given in compliance with the FCC's rules.

(2) A customer's approval or disapproval obtained by Inland to use, disclose, or permit access to the customer's CPNI, the use of CPNI outside of the customer's total service relationship with Inland must remain in effect until the customer revokes or limits such approval or disapproval.

(3) Inland must maintain records of notification and approval, whether oral, written or electronic, for at least one year.

B. Use of Opt-Out and Opt-In Approval Processes.

(1) Except where use, disclosure, or access to CPNI is otherwise permitted without prior customer approval (as described above), Inland only uses, discloses or permits access to CPNI upon opt-out or opt-in approval, consistent with Section 64.2007 of the Commission's rules and, by December 8, 2007, with the Commission's amended rules. Inland's process is described in Section II.A above.

(2) Except for use and disclosure of CPNI that is permitted without customer approval under Section I, or that is described Section II.B, or as otherwise provided in section 222 of the Communications Act of 1934, as amended, Inland may only use, disclose, or permit access to its customer's individually identifiable CPNI subject to opt-in approval.

The Company currently does not use CPNI in a manner that requires prior customer approval. Should Inland's policy change, however, Inland shall implement the foregoing policies to ensure the FCC's rules are complied with.

III. Notice required for use of customer proprietary network information.

A. Notification, Generally.

(1) Prior to any solicitation for customer approval, Inland must provide notification to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI.

(2) Inland must maintain records of notification, whether oral, written or electronic, for at least one year.

B. Individual notice to customers must be provided when soliciting approval to use, disclose, or permit access to customers' CPNI.

C. Content of Notice.

Customer notification must provide sufficient information to enable the customer to make an informed decision as to whether to permit Inland to use, disclose, or permit access to, the customer's CPNI.

(1) The notification must state that the customer has a right, and Inland has a duty, under federal law, to protect the confidentiality of CPNI.

(2) The notification must specify the types of information that constitute CPNI and the specific entities that will receive the CPNI, describe the purposes for which CPNI will be used, and inform the customer of his or her right to disapprove those uses, and deny or withdraw access to CPNI at any time.

(3) The notification must advise the customer of the precise steps the customer must take in order to grant or deny access to CPNI, and must clearly state that a denial of approval will not affect the provision of any services to which the customer subscribes. However, Inland may provide a brief statement, in clear and neutral language, describing consequences directly resulting from the lack of access to CPNI.

(4) The notification must be comprehensible and must not be misleading.

(5) If written notification is provided, the notice must be clearly legible, use sufficiently large type, and be placed in an area so as to be readily apparent to a customer.

(6) If any portion of a notification is translated into another language, then all portions of the notification must be translated into that language.

(7) Inland may state in the notification that the customer's approval to use CPNI may enhance Inland's ability to offer products and services tailored to the customer's needs. Inland also may state in the notification that it may be compelled to disclose CPNI to any person upon affirmative written request by the customer.

(8) Inland may not include in the notification any statement attempting to encourage a customer to freeze third-party access to CPNI.

(9) The notification must state that any approval or denial of approval for the use of CPNI outside of the service to which the customer already subscribes from Inland is valid until the customer affirmatively revokes or limits such approval or denial.

(10) Inland's solicitation for approval must be proximate to the notification of a customer's CPNI rights.

D. Notice Requirements Specific to Opt-Out.

Inland must provide notification to obtain opt-out approval through electronic or written methods, but not by oral communication (except as provided in paragraph F of this section). The

contents of any such notification must comply with the requirements of paragraph C of this section.

(1) Inland must wait a 30-day minimum period of time after giving customers notice and an opportunity to opt-out before assuming customer approval to use, disclose, or permit access to CPNI. Inland may, in its discretion, provide for a longer period. Inland must notify customers as to the applicable waiting period for a response before approval is assumed.

(i) In the case of an electronic form of notification, the waiting period shall begin to run from the date on which the notification was sent; and

(ii) In the case of notification by mail, the waiting period shall begin to run on the third day following the date that the notification was mailed.

(2) Insofar as Inland is using the opt-out mechanism, it must provide a Notice to its customers every two years.

(3) If Inland uses e-mail to provide opt-out notices, it must comply with the following requirements in addition to the requirements generally applicable to notification:

(i) Inland must obtain express, verifiable, prior approval from consumers to send notices via e-mail regarding its service in general, or CPNI in particular;

(ii) Inland must allow customers to reply directly to e-mails containing CPNI notices in order to opt-out;

(iii) Opt-out e-mail notices that are returned to Inland as undeliverable must be sent to the customer in another form before Inland may consider the customer to have received notice;

(iv) Inland must ensure that the subject line of the message clearly and accurately identifies the subject matter of the e-mail; and

(v) Inland must make available to every customer a method to opt-out that is of no additional cost to the customer and that is available 24 hours a day, seven days a week. Inland may satisfy this requirement through a combination of methods, so long as all customers have the ability to opt-out at no cost and are able to effectuate that choice whenever they choose.

E. Notice Requirements Specific to Opt-In.

Inland may provide notification to obtain opt-in approval through oral, written, or electronic methods. The contents of any such notification must comply with the requirements of paragraph C of this section.

F. Notice Requirements Specific to One-Time Use of CPNI.

(1) Inland may use oral notice to obtain limited, one-time use of CPNI for inbound and outbound customer telephone contacts for the duration of the call, regardless of whether Inland uses opt-out or opt-in approval based on the nature of the contact.

(2) The contents of any such notification must comply with the requirements of paragraph C of this section, except that Inland may omit any of the following notice provisions if not relevant to the limited use for which Inland seeks CPNI:

(i) Inland need not advise customers that if they have opted-out previously, no action is needed to maintain the opt-out election;

(ii) Inland need not advise customers that they may share CPNI with their affiliates or third parties and need not name those entities, if the limited CPNI usage will not result in use by, or disclosure to, an affiliate or third party;

(iii) Inland need not disclose the means by which a customer can deny or withdraw future access to CPNI, so long as Inland explains to customers that the scope of the approval Inland seeks is limited to one-time use; and

(iv) Inland may omit disclosure of the precise steps a customer must take in order to grant or deny access to CPNI, as long as Inland clearly communicates that the customer can deny access to his CPNI for the call.

The Company currently does not use CPNI in a manner that requires prior customer approval. Should Inland's policy change, however, Inland shall implement the foregoing policies to ensure the FCC's rules are complied with.

IV. Safeguards required for use and disclosure of customer proprietary network information.

A. Inland must implement a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI. Inland's policies and procedures are detailed in Section II above.

B. Effective December 8, 2007, Inland may release call detail information during a customer initiated telephone contact only if reasonable authentication procedures are complied with and (1) the customer provides Inland with a pre-established password, (2) Inland, at the customer's request, sends the call detail information to the customer's address of record provided the address of record has been associated with the account for at least thirty (30) days, or (3) when Inland calls the telephone number of record to disclose the call detail information. Inland is permitted to create a back-up customer authentication method for lost or forgotten passwords. Inland is also prohibited from releasing call detail information during a retail visit without the appropriate password or valid photo identification.

However, if the during a customer-initiated telephone contact, the customer is able to provide without assistance from Inland personnel all of the call detail information necessary to

address a customer service issue (i.e., the telephone number called, when it was called, and if applicable the amount charged for the call), then Inland personnel are permitted to proceed with its routine customer care procedures.

C. Not later than June 8, 2008, Inland must authenticate a customer without readily available biographical or account information prior to allowing the customer on-line access to CPNI related telecommunication service account. Once authenticated, the customer may only obtain on-line access to CPNI related telecommunications service account through a password.

D. Effective December 8, 2007, Inland is required to notify customers immediately when a password or back-up means of authentication for lost or forgotten passwords, on-line account, or address of record is created or changed. Such notification is not required when the customer initiates service, including the selection of a password.

E. Business customers are exempt from the password requirements which became effective December 8, 2007, if: the customer is contractually bound to Inland, is serviced by a dedicated Inland account representative as the primary contact, and within the contract Inland is responsible to address its CPNI obligations. If, at any point, the business customer must go through a call center to reach a customer service representative, then the exemption does not apply.

F. Inland trains its personnel as to when they are and are not authorized to use CPNI, and Inland must have an express disciplinary process in place.

G. Inland must maintain a record, electronically or in some other manner, of its own and its affiliates' sales and marketing campaigns that use its customers' CPNI. Inland shall maintain a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record must include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign. Inland shall retain the record for a minimum of one year.

H. Inland must establish a supervisory review process regarding its compliance with the FCC's CPNI rules for outbound marketing situations and maintain records of its compliance for a minimum period of one year. Specifically, sales personnel must obtain supervisory approval of any proposed outbound marketing request for customer approval.

I. Effective December 8, 2007, Inland must take reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI, which may include encryption of its databases. Inland must properly authenticate a customer prior to disclosing CPNI based on a customer-initiated telephone contact, on-line account access, or an in-store visit.

Inland must take measures to protect CPNI stored in its internal databases from potential unauthorized access, and evaluate and increase its security measures should it discover an increase in attempts to gain access to unauthorized information.

J. Inland must provide written notice within five business days to the FCC of any instance where the opt-out mechanisms do not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.

(1) The notice shall be in the form of a letter, and shall include Inland's name, a description of the opt-out mechanism(s) used, the problem(s) experienced, the remedy proposed and when it will be/was implemented, whether the relevant state commission(s) has been notified and whether it has taken any action, a copy of the notice provided to customers, and contact information.

(2) Such notice must be submitted even if Inland offers other methods by which consumers may opt-out.

K. Effective December 8, 2007, Inland has a general duty to first inform federal law enforcement agencies, followed up by notification to affected customers, after reasonable determination of a breach of its customers' CPNI.

(1) Inland must file an electronic notification to the United States Secret Service (USSS) and the Federal Bureau of Investigation (FBI) within seven (7) business days through the central reporting facility furnished by the Commission.

(2) Inland is prohibited from notifying customers or the general public of the breach until seven (7) business days have passed after notification to the USSS and FBI unless under certain specified circumstances: (a) Inland identifies an "extraordinary need to notify customers" before that period or (b) An ongoing or potential investigation or national security requires customer disclosure to be potentially delayed for up to thirty (30) days. Inland must notify the affected customer(s) after the applicable period.

(3) Inland must maintain a record, whether electronically or in some other manner of any breaches discovered, notifications made to the USSS or FBI and notifications made to customers. The record must include, if available, dates of discovery and notification, a detailed description of the CPNI that was the subject of the breach, and the circumstances of the breach. Records must be maintained for a two (2) year period.

Inland's operating procedures comply with all of the above requirements, including those that became effective December 8, 2007. With respect to online authentication in particular, Inland implemented measures to ensure compliance by the applicable June 8, 2008 deadline. As previously discussed, the Company currently does not use CPNI in a manner that requires prior customer approval. Should Inland's policy change, however, Inland shall implement the relevant aforementioned policies to ensure the FCC's rules are complied with. Inland notes in particular that:

- *Company personnel are trained as to when they are and are not authorized to use CPNI, and that an express process is in place such that violations of these procedures may result in disciplinary action, up to and including termination of employment.*
- *Inland does not provide customers' with online access to their CPNI at this time.*
- *With respect to business customers subject to Section IV.E above, Inland requires them to provide the names of all that are authorized to have access to the account and at what authorization level (e.g. to make service changes, request additional services,*

billing inquiries) and further requires that a 6 to 10-place alphanumeric password be established.

- *Operating procedures have been implemented to comply with the remaining requirements described above and applicable to Inland's use, disclosure of and third party access to CPNI.*

V. Supplemental Information

Effective December 8, 2007, the FCC's rules require that the annual certification filed pursuant to 47 C.F.R. § 64.2009(e) disclose any actions taken against data brokers and a summary of all consumer complaints received in the previous calendar year regarding the unauthorized release of CPNI. Inland is not aware of any consumer complaints regarding the unauthorized release of CPNI and has not taken action against any data brokers.

INLAND TELEPHONE COMPANY

103 S. 2ND Street
P.O. Box 171
Roslyn, WA 98941
(509) 649-2211; (800) 462-4578
Fax (509) 649-2555

CERTIFICATION BY CUSTOMER IN ORDER TO RECEIVE FEDERAL LIFELINE SUPPORT

STATE ELIGIBILITY (Subscriber signature not required)

I certify that I am qualified through the:

- Community Action Partnership Association of Idaho (CAPAI) (Inland must receive email confirmation from CAPAI)
- Washington Department of Social and Health Services (DSHS) - Case # _____
(Must have a current Washington DSHS Case # and participate in at least one of the programs below)
 - Supplemental Nutrition Assistance Program (SNAP)(Food Stamps)
 - Temporary Assistance for Needy Families (TANF)
 - Supplemental Security Income (SSI)
 - Medicaid (Medical Assistance)
 - State Family Assistance (SFA)
 - Pregnant Women Assistance (PWA)
 - Aged, Blind, or Disabled (ABD) Cash Assistance
 - Refugee Assistance
 - Community Options Program Entry System (COPES)
 - Chore Services

INCOME ELIGIBILITY

- I certify that my household income is at or below 135% of the federal poverty guidelines and therefore I qualify for Lifeline Support under the federal income requirements and have provided proof of my qualifications.

FEDERAL ELIGIBILITY

I certify that I qualify for Lifeline Support and am currently participating in one or more of the programs listed that I have checked below and am providing a copy of my benefit or program participation card or award letter.

- Federal Public Housing Assistance (FPHA) or Section 8
- Supplemental Nutrition Assistance Program (SNAP)(Food Stamps)
- Low Income Home Energy Assistance Program (LIHEAP)
- National School Lunch Program's free lunch program
- Medicaid
- Temporary Assistance for Needy Families (TANF)
- Supplemental Security Income (SSI)

TRIBAL LIFELINE ELIGIBILITY

Tribal Identification Number _____

I certify that I qualify for tribal Lifeline Support, as I reside on land that meets the Bureau of Indian Affairs definition of "reservation" (any federally recognized Indian tribe's reservation, Pueblo, or Colony including former reservations in Oklahoma, Alaska Native regions, and Indian Allotments) **AND** participate in one or more of the programs listed that I have checked below and am providing a copy of my benefit or program participation card or award letter.

- Federal Public Housing Assistance (FPHA) or Section 8
- Supplemental Nutrition Assistance Program (SNAP)(Food Stamps)
- Low Income Home Energy Assistance Program (LIHEAP)
- National School Lunch Program's free lunch program
- Head Start (Income eligible)
- Medicaid
- Bureau of Indian Affairs General Assistance
- Tribal Administered Temporary Assistance for Needy Families (TTANF)
- Temporary Assistance for Needy Families (TANF)
- Food Distribution Program on Indian Reservations
- Supplemental Security Income (SSI)
- Income Eligibility (See Income Eligibility)

SUBSCRIBER CERTIFICATION

It is understood that by participating in the Lifeline program, the support that I receive is not actual payment to me but a discount on my monthly billed service. Participating in Lifeline does not protect me from collection procedures if I do not pay my phone bill. I fully understand that this discount, as well as the criteria for participation in the Lifeline Program, may change and I may no longer qualify, or the amount of support may increase or decrease.

As the Certifying Subscriber, I certify that, (i) the service is for me and not a member of the household; (ii) I am not listed as a dependent on someone else's tax return; and, (iii) the service address is my primary residence. I further certify that the service that I receive from Inland Telephone Company is my main line of service and neither I nor anyone in my household receives Lifeline Support for any other telecommunications service. Further, I understand that Lifeline is a federal benefit program that provides a monthly discount on either home or mobile telephone service and **ONLY ONE** Lifeline discount is allowed per household. Members of a household are not permitted to receive Lifeline Support from multiple telecommunications companies. I understand that violation of the one-per-household requirement will result in de-enrollment from the program and possible fines and imprisonment. As the Certifying Subscriber claiming income eligibility, I certify that the documentation I have provided accurately represents: (i) my household income and the number of persons in my household; or, (ii) proof of participation in an eligible program.

I certify that I will notify Inland Telephone Company within 30 days, (i) if for any reason I should no longer participate in any of the eligible programs or qualify by income, and or (ii) if I move from the address provided on this form. If my address listed above is temporary, I certify that I will verify my address to Inland Telephone Company every 90 days. I understand that if I fail to respond to an attempt to verify my address within 30 days, my Lifeline support may be terminated. I understand that if I fail to give notice as required, I am subject to penalties, including de-enrollment, being barred from the program and fines and imprisonment.

I understand that Lifeline Support is not transferrable and that I may not transfer my service to any individual, including another eligible Lifeline Support recipient. I further understand that if my service goes unused for 60 days, my service will be suspended subject to a 30 day period in which I may use the service or contact Inland Telephone Company to confirm that I want to continue receiving the service.

Further, I fully understand that in order to continue to receive this support, I must annually, or more often, certify my eligibility and provide proof of eligibility. I understand that my failure to timely re-certify will result in de-enrollment and termination of my Lifeline benefits.

I fully understand that the Lifeline Program is administered by the Universal Service Administration Company (USAC) under the guidance and authority of the Federal Communications Commission (FCC) and that all of the information that I have supplied pertaining to my eligibility will be shared with USAC and the FCC and I give my consent to do so.

I certify that the information provided on this form is true and correct to the best of my knowledge under penalty of perjury and if I have provided any misleading statements in order to receive support, I will be liable for any support received, my service may be discontinued, it may result in de-enrollment and my being barred from the program and I would be subject to state and federal fines and imprisonment.

SIGNATURE OF APPLICANT _____ DATE _____

APPLICANT (PRINTED) _____

SOCIAL SECURITY NUMBER XXX-XX- _____

DATE OF BIRTH _____

SERVICE ADDRESS _____

BILLING ADDRESS _____

TELEPHONE NUMBER _____

NUMBER OF PERSONS IN FAMILY OR HOUSEHOLD _____

////////// BELOW - FOR OFFICIAL USE ONLY //////////

Inland Telephone Company service - Customers serving Exchange

- | | | | |
|--------------------------|--------------|--------------------------|---------------|
| <input type="checkbox"/> | DEWATTO, WA | <input type="checkbox"/> | UNIONTOWN, WA |
| <input type="checkbox"/> | PRESCOTT, WA | <input type="checkbox"/> | LENORE, ID |
| <input type="checkbox"/> | ROSLYN, WA | <input type="checkbox"/> | LEON, ID |

SIGNATURE OF CUSTOMER SERVICE REPRESENTATIVE _____

PRINTED NAME OF CUSTOMER SERVICE REPRESENTATIVE _____

See Federal Poverty Guideline for a list of acceptable documentation for income eligibility.

Inland Telephone Company will keep the information contained in this form confidential, except as required by federal or state law. ALL INFORMATION COMPLETED ON THIS FORM IS SUBJECT TO STATE AND FEDERAL PERJURY PENALTIES .

INLAND TELEPHONE COMPANY

(509) 649-2211; (800) 462-4578

Fax (509) 649-2555

LIFELINE HOUSEHOLD WORKSHEET

Your **household** is everyone who lives together at your address as one economic unit (including children and people who are not related to you).

The **adults** you live with are part of your **economic unit** if they contribute to and share in the income and expenses of the household. An **adult** is any person 18 years of age or older, or an emancipated minor (a person under age 18 who is legally considered to be an adult). **Household expenses** include food, health care expenses (such as medical bills) and the cost of renting or paying a mortgage on your place of residence (a house or apartment, for example) and utilities (including water, heat and electricity). **Income includes** salary, public assistance benefits, social security payments, pensions, unemployment compensation, veteran's benefits, inheritances, alimony, child support payments, worker's compensation benefits, gifts, and lottery winnings

Spouses and domestic partners are considered to be part of the same household. Children under the age of 18 living with their parents or guardians are considered to be part of the same household as their parents or guardians. If an adult has no income, or minimal income, and lives with someone who provides financial support to that adult, both people are considered part of the same household.

You have been asked to complete this Worksheet because someone else currently receives a Lifeline-supported service at your address. This other person may or may not be a part of your household. Answer the questions below to determine whether there is more than one household residing at your address.

1) Does your spouse or domestic partner (that is, someone you are married to or in a relationship with) already receive a Lifeline-discounted phone? (check NO if you do not have a spouse or partner)

YES NO

> If you checked **YES**, you may not sign up for Lifeline because someone in your household already receives Lifeline. **Only ONE** Lifeline discount is allowed per household.

> If you checked **NO**, please answer question #2.

2) Other than a spouse or partner, do other adults (people over the age of 18 or emancipated minors) live with you at your address?

- A. A parent YES NO
- B. An adult son or daughter YES NO
- C. Another adult relative (such as a sibling, aunt, cousin, grandparent, grandchild, etc..) YES NO
- D. An adult roommate YES NO
- E. Other _____ YES NO

> If you checked **NO** for each statement above, you do not need to answer the remaining questions. **Please initial line B**, below, and sign and date the worksheet.

> If you checked **YES**, please answer question #3.

3) Do you share living expenses (bills, food, etc.) and share income (either your income, the other person's income or both incomes together) with at least one of the adults listed above in question #2?

YES NO

> If you checked **NO**, then your address includes **more than one household**. **Please initial lines A and B below**, and sign and date the worksheet.

> If you checked **YES**, then your address includes **only one household**. You **may not** sign up for Lifeline because someone in your household already receives Lifeline.

CERTIFICATION

Please initial the certification below and sign and date this worksheet which must accompany your Lifeline application.

A. _____ I certify that I live at an address occupied by multiple households.

B. _____ I understand that violation of the one-per-household requirement is against the Federal Communications Commission's rules and may result in me losing my Lifeline benefits, and potentially, prosecution by the United States Government.

SIGNATURE _____

DATE _____

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)

<u>472423</u> Study Area Code (SAC) <i>(An Eligible Telecommunications Carrier (ETC) must provide a certification form for each SAC through which it provides Lifeline service).</i>	
<u>Idaho</u> State	<u>Inland Telephone Company</u> ETC Name
<u>Inland Networks</u> DBA, Marketing or Other Branding Name <i>(If same-as ETC name, list "N/A" Do <u>not</u> leave blank)</i>	<u>Western Elite Incorporated Services</u> Holding Company Name <i>(If same as ETC name, list "N/A" Do not leave blank)</i>

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 <i>(February data month)</i>	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 <u>initially</u> enrolled in the current Form 555 calendar year <i>(These subscribers did not have Lifeline service prior to January 1 of the current 555 calendar year.)</i>	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 <i>(This should be a subset of Block G.)</i>	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 CP

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 <u>or</u> through a state administrator, ETC access to a state database, or by USAC <i>(This should equal the number reported in Block E)</i>	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
 jbrooks@inlandnet.com

 Email Address of Officer
 James K. Brooks

 Person Completing This Certification Form

James K. Brooks, Treasurer

 Printed Name and Title of Officer
 January 27, 2015

 Date
 (509) 649-2211

 Contact Phone Number

USDA-RUS OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS	This data will be used by RUS to review your financial situation. Your response is required by 7 U.S.C. 901 et seq. and, subject to federal laws and regulations regarding confidential information, will be treated as confidential. BORROWER NAME Inland Telephone Company (Prepared with Audited Data)
--	--

INSTRUCTIONS-Submit report to RUS within 30 days after close of the period. For detailed instructions, see RUS Bulletin 1744-2. Report in whole dollars only.	PERIOD ENDING December, 2014	BORROWER DESIGNATION WA0534
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CERTIFICATION

We hereby certify that the entries in this report are in accordance with the accounts and other records of the system and reflect the status of the system to the best of our knowledge and belief.

ALL INSURANCE REQUIRED BY 7 CFR PART 1788, CHAPTER XVII, RUS, WAS IN FORCE DURING THE REPORTING PERIOD AND RENEWALS HAVE BEEN OBTAINED FOR ALL POLICIES.

DURING THE PERIOD COVERED BY THIS REPORT PURSUANT TO PART 1788 OF 7CFR CHAPTER XVII

(Check one of the following)

All of the obligations under the RUS loan documents have been fulfilled in all material respects.

There has been a default in the fulfillment of the obligations under the RUS loan documents. Said default(s) is/are specifically described in the Telecom Operating Report

Gregory Maras

3/31/2015

DATE

PART A. BALANCE SHEET

	BALANCE PRIOR YEAR	BALANCE END OF PERIOD		BALANCE PRIOR YEAR	BALANCE END OF PERIOD
ASSETS			LIABILITIES AND STOCKHOLDERS' EQUITY		
CURRENT ASSETS			CURRENT LIABILITIES		
1. Cash and Equivalents	298,416	114,840	25. Accounts Payable	1,134,728	872,782
2. Cash-RUS Construction Fund	395,813	75,774	26. Notes Payable	0	0
3. Affiliates:			27. Advance Billings and Payments	0	0
a. Telecom, Accounts Receivable	84,486	0	28. Customer Deposits	2,539	2,329
b. Other Accounts Receivable			29. Current Mat. L/T Debt	389,000	448,400
c. Notes Receivable	0	0	30. Current Mat. L/T Debt-Rur. Dev.	0	0
4. Non-Affiliates:			31. Current Mat.-Capital Leases	0	0
a. Telecom, Accounts Receivable	636,441	538,193	32. Income Taxes Accrued	60,011	20
b. Other Accounts Receivable	0	0	33. Other Taxes Accrued	142,940	98,938
c. Notes Receivable	0	0	34. Other Current Liabilities	815,571	356,671
5. Interest and Dividends Receivable	0	0	35. Total Current Liabilities (25 thru 34)	2,544,789	1,779,140
6. Material-Regulated	269,547	241,005	LONG-TERM DEBT		
7. Material-Nonregulated	0	0	36. Funded Debt-RUS Notes	231,678	168,166
8. Prepayments	38,205	42,366	37. Funded Debt-RTB Notes	65,936	45,278
9. Other Current Assets	0	0	38. Funded Debt-FFB Notes	2,816,944	6,229,991
10. Total Current Assets (1 Thru 9)	1,722,908	1,012,178	39. Funded Debt-Other	(2,655)	(3,363)
NONCURRENT ASSETS			40. Funded Debt-Rural Develop. Loan	0	0
11. Investment in Affiliated Companies			41. Premium (Discount) on L/T Debt	0	0
a. Rural Development	51,709	733,101	42. Reacquired Debt	0	0
b. Nonrural Development	0	0	43. Obligations Under Capital Lease	0	0
12. Other Investments			44. Adv. From Affiliated Companies	0	0
a. Rural Development	0	0	45. Other Long-Term Debt	0	0
b. Nonrural Development	190,106	201,491	46. Total Long-Term Debt (36 thru 45)	3,111,903	6,440,072
13. Nonregulated Investments	1,821,312	1,606,179	OTHER LIAB. & DEF. CREDITS		
14. Other Noncurrent Assets	250	250	47. Other Long-Term Liabilities	0	0
15. Deferred Charges	0	0	48. Other Deferred Credits	528,126	578,942
16. Jurisdictional Differences	0	0	49. Other Jurisdictional Differences	0	0
17. Total Noncurrent Assets (11 thru 16)	2,063,377	2,541,021	50. Total Other Liabilities and Deferred Credits (47 thru 49)	528,126	578,942
PLANT, PROPERTY, AND EQUIPMENT			EQUITY		
18. Telecom, Plant-in-Service	22,848,876	27,004,739	51. Cap. Stock Outstand. & Subscribed	93,150	93,150
19. Property Held for Future Use	0	0	52. Additional Paid-in-Capital	7,175	7,175
20. Plant Under Construction	2,578,522	2,292,893	53. Treasury Stock	0	0
21. Plant Adj., Nonop. Plant & Goodwill	0	0	54. Membership and Cap. Certificates	0	0
22. Less Accumulated Depreciation	16,940,466	17,846,483	55. Other Capital	0	0
23. Net Plant (18 thru 21 less 22)	8,486,932	11,451,149	56. Patronage Capital Credits	0	0
24. TOTAL ASSETS (10+17+23)			57. Retained Earnings or Margins	5,988,074	6,105,869
	12,273,217	15,004,348	58. Total Equity (51 thru 57)	6,088,399	6,206,194
			59. TOTAL LIABILITIES AND EQUITY (35+46+50+58)	12,273,217	15,004,348

Total Equity = 41.36% % of Total Assets

**OPERATING REPORT FOR
TELECOMMUNICATIONS BORROWERS**

WA0534

PERIOD ENDING

December, 2014

INSTRUCTIONS- See RUS Bulletin 1744-2

PART B. STATEMENTS OF INCOME AND RETAINED EARNINGS OR MARGINS

ITEM	PRIOR YEAR	THIS YEAR
1. Local Network Services Revenues	668,600	675,461
2. Network Access Services Revenues	4,213,114	4,179,688
3. Long Distance Network Services Revenues	(788)	(1,216)
4. Carrier Billing and Collection Revenues	55,958	51,445
5. Miscellaneous Revenues	52,563	70,664
6. Uncollectible Revenues	6,272	7,139
7. Net Operating Revenues (1 thru 5 less 6)	4,983,175	4,968,903
8. Plant Specific Operations Expense	2,001,657	1,762,438
9. Plant Nonspecific Operations Expense (Excluding Depreciation & Amortization)	333,319	396,535
10. Depreciation Expense	1,316,875	1,346,798
11. Amortization Expense	182	182
12. Customer Operations Expense	549,599	595,029
13. Corporate Operations Expense	1,011,766	951,200
14. Total Operating Expenses (8 thru 13)	5,213,398	5,052,182
15. Operating Income or Margins (7 less 14)	(230,223)	(83,279)
16. Other Operating Income and Expenses		
17. State and Local Taxes	126,725	139,873
18. Federal Income Taxes	(167,547)	(120,071)
19. Other Taxes	0	0
20. Total Operating Taxes (17+18+19)	(40,822)	19,802
21. Net Operating Income or Margins (15+16-20)	(189,401)	(103,081)
22. Interest on Funded Debt	75,452	144,819
23. Interest Expense - Capital Leases	0	0
24. Other Interest Expense	19,260	10,098
25. Allowance for Funds Used During Construction	0	30,457
26. Total Fixed Charges (22+23+24-25)	94,712	124,460
27. Nonoperating Net Income	(14,982)	(2,287)
28. Extraordinary Items	0	
29. Jurisdictional Differences	0	
30. Nonregulated Net Income	(3,308)	348,954
31. Total Net Income or Margins (21+27+28+29+30-26)	(302,403)	119,126
32. Total Taxes Based on Income	(165,487)	
33. Retained Earnings or Margins Beginning-of-Year	6,286,883	5,988,074
34. Miscellaneous Credits Year-to-Date	3,594	
35. Dividends Declared (Common)	0	
36. Dividends Declared (Preferred)	0	
37. Other Debits Year-to-Date	0	1,331
38. Transfers to Patronage Capital	0	
39. Retained Earnings or Margins End-of-Period [(31+33+34) - (35+36+37+38)]	5,988,074	6,105,869
40. Patronage Capital Beginning-of-Year	0	
41. Transfers to Patronage Capital	0	
42. Patronage Capital Credits Retired	0	
43. Patronage Capital End-of-Year (40+41-42)	0	0
44. Annual Debt Service Payments	780,069	643,649
45. Cash Ratio [(14+20-10-11) / 7]	0.7737	0.7497
46. Operating Accrual Ratio [(14+20+26) / 7]	1.0570	1.0458
47. TIER [(31+26) / 26]	-2.1929	1.9571
48. DSCR [(31+26+10+11) / 44]	1.4221	2.4712

USDA-RUS

**OPERATING REPORT FOR
TELECOMMUNICATIONS BORROWERS**

INSTRUCTIONS - See RUS Bulletin 1744-2

BORROWER DESIGNATION

WA0534

PERIOD ENDED

December, 2014

Part C. SUBSCRIBER (ACCESS LINE), ROUTE MILE, & HIGH SPEED DATA INFORMATION

EXCHANGE	1. RATES		2. SUBSCRIBERS (ACCESS LINES)			3. ROUTE MILES	
	B-1 (a)	R-1 (b)	BUSINESS (a)	RESIDENTIAL (b)	TOTAL (c)	TOTAL (including fiber) (a)	FIBER (b)
DEWATTO	27.00	22.00	19	293	312	144.03	40.07
PRESCOTT	26.50	16.50	41	115	156	198.31	43.37
ROSLYN	24.00	14.00	187	1,014	1,201	157.54	34.06
LEON	40.68	25.76	1	24	25	20.37	13.14
LENORE	40.68	25.76	24	234	258	178.24	12.00
UNIONTOWN	25.00	15.00	213	297	510	258.81	64.17
MobileWireless					0		
Route Mileage Outside Exchange Area						18.07	18.07
Total			485	1,977	2,462	975.37	224.88
No. Exchanges	6						

USDA-RUS

**OPERATING REPORT FOR
TELECOMMUNICATIONS BORROWERS**

INSTRUCTIONS - See RUS Bulletin 1744-2

BORROWER DESIGNATION

WA0534

PERIOD ENDED

December, 2014

Part C. SUBSCRIBER (ACCESS LINE), ROUTE MILE, & HIGH SPEED DATA INFORMATION

4. BROADBAND SERVICE

Details on Least Expensive Broadband Service								
EXCHANGE	No. Access Lines with BB available (a)	No Of Broadband Subscribers (b)	Number Of Subscribers (c)	Advertised Download Rate (Kbps) (d)	Advertised Upload Rate (Kbps) (e)	Price Per Month (f)	Standalone/Pckg (f)	Type Of Technology (g)
DEWATTO	312	226	74	768	512	39.95	Package	DSL
PRESCOTT	156	57	29	768	512	39.95	Package	DSL
ROSLYN	1,201	885	749	6,000	1,500	49.95	Package	DSL
LEON	25	17	13	6,000	1,500	49.95	Package	DSL
LENORE	258	133	115	768	512	39.95	Package	DSL
UNIONTOWN	510	245	190	6,000	1,500	49.95	Package	DSL
Total	2,462	1,563						

USDA-RUS OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS	BORROWER DESIGNATION WA0534
	PERIOD ENDING December, 2014

INSTRUCTIONS- See RUS Bulletin 1744-2

PART D. SYSTEM DATA

1. No. Plant Employees 17	2. No. Other Employees 31	3. Square Miles Served 463	4. Access Lines per Square Mile 5.32	5. Subscribers per Route Mile 2.52
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PART E. TOLL DATA

1. Study Area ID Code(s) a. 472423 b. 522423 c. _____ d. _____ e. _____ f. _____ g. _____ h. _____ i. _____ j. _____	2. Types of Toll Settlements (Check one) Interstate: <input type="checkbox"/> Average Schedule <input checked="" type="checkbox"/> Cost Basis Intrastate: <input type="checkbox"/> Average Schedule <input checked="" type="checkbox"/> Cost Basis
--	--

PART F. FUNDS INVESTED IN PLANT DURING YEAR

1. RUS, RTB, & FFB Loan Funds Expended	3,887,106
2. Other Long-Term Loan Funds Expended	
3. Funds Expended Under RUS Interim Approval	
4. Other Short-Term Loan Funds Expended	
5. General Funds Expended (Other than Interim)	839,292
6. Salvaged Materials	
7. Contribution in Aid to Construction	
8. Gross Additions to Telecom. Plant (1 thru 7)	4,726,398

PART G. INVESTMENTS IN AFFILIATED COMPANIES

INVESTMENTS (a)	CURRENT YEAR DATA		CUMULATIVE DATA		
	Investment This Year (b)	Income/Loss This Year (c)	Cumulative Investment To Date (d)	Cumulative Income/Loss To Date (e)	Current Balance (f)
1. Investment in Affiliated Companies - Rural Development	681,392		733,101		733,101
2. Investment in Affiliated Companies - Nonrural Development					

USDA-RUS
**OPERATING REPORT FOR
TELECOMMUNICATIONS BORROWERS**

BORROWER DESIGNATION

WA0534

PERIOD ENDING

December, 2014

PART H. CURRENT DEPRECIATION RATES

Are corporation's depreciation rates approved by the regulatory authority with jurisdiction over the provision of telephone services? (Check one)

YES

NO

EQUIPMENT CATEGORY	DEPRECIATION RATE
1. Land and support assets - Motor Vehicles	16.00%
2. Land and support assets - Aircraft	
3. Land and support assets - Special purpose vehicles	
4. Land and support assets - Garage and other work equipment	16.00%
5. Land and support assets - Buildings	4.00%
6. Land and support assets - Furniture and Office equipment	15.00%
7. Land and support assets - General purpose computers	25.00%
8. Central Office Switching - Digital	9.00%
9. Central Office Switching - Analog & Electro-mechanical	
10. Central Office Switching - Operator Systems	
11. Central Office Transmission - Radio Systems	13.00%
12. Central Office Transmission - Circuit equipment	11.19%
13. Information origination/termination - Station apparatus	
14. Information origination/termination - Customer premises wiring	
15. Information origination/termination - Large private branch exchanges	
16. Information origination/termination - Public telephone terminal equipment	
17. Information origination/termination - Other terminal equipment	
18. Cable and wire facilities - Poles	7.59%
19. Cable and wire facilities - Aerial cable - Metal	42.06%
20. Cable and wire facilities - Aerial cable - Fiber	5.00%
21. Cable and wire facilities - Underground cable - Metal	6.00%
22. Cable and wire facilities - Underground cable - Fiber	5.00%
23. Cable and wire facilities - Buried cable - Metal	
24. Cable and wire facilities - Buried cable - Fiber	
25. Cable and wire facilities - Conduit systems	
26. Cable and wire facilities - Other	

USDA-RUS

BORROWER DESIGNATION

WA0534

**OPERATING REPORT FOR
TELECOMMUNICATIONS BORROWERS**

PERIOD ENDED

December, 2014

INSTRUCTIONS – See help in the online application.

PART I – STATEMENT OF CASH FLOWS

1. Beginning Cash (Cash and Equivalents plus RUS Construction Fund)	694,229
CASH FLOWS FROM OPERATING ACTIVITIES	
2. Net Income	119,126
<i>Adjustments to Reconcile Net Income to Net Cash Provided by Operating Activities</i>	
3. Add: Depreciation	1,346,798
4. Add: Amortization	182
5. Other (Explain) Increase in CSV-(\$5,650), Depreciation on non-regulated investments-\$113,624, Deferred FIT-\$51,502	159,476
<i>Changes in Operating Assets and Liabilities</i>	
6. Decrease/(Increase) in Accounts Receivable	182,734
7. Decrease/(Increase) in Materials and Inventory	28,542
8. Decrease/(Increase) in Prepayments and Deferred Charges	(4,161)
9. Decrease/(Increase) in Other Current Assets	0
10. Increase/(Decrease) in Accounts Payable	(261,946)
11. Increase/(Decrease) in Advance Billings & Payments	0
12. Increase/(Decrease) in Other Current Liabilities	(562,893)
13. Net Cash Provided/(Used) by Operations	1,007,858
CASH FLOWS FROM FINANCING ACTIVITIES	
14. Decrease/(Increase) in Notes Receivable	0
15. Increase/(Decrease) in Notes Payable	0
16. Increase/(Decrease) in Customer Deposits	(210)
17. Net Increase/(Decrease) in Long Term Debt (Including Current Maturities)	3,387,569
18. Increase/(Decrease) in Other Liabilities & Deferred Credits	50,816
19. Increase/(Decrease) in Capital Stock, Paid-in Capital, Membership and Capital Certificates & Other Capital	0
20. Less: Payment of Dividends	0
21. Less: Patronage Capital Credits Retired	0
22. Other (Explain) Deferred FIT on Investments-\$686, Operating Deferred FIT-(\$51,502)	(50,816)
23. Net Cash Provided/(Used) by Financing Activities	3,387,359
CASH FLOWS FROM INVESTING ACTIVITIES	
24. Net Capital Expenditures (Property, Plant & Equipment)	(3,870,234)
25. Other Long-Term Investments	(477,644)
26. Other Noncurrent Assets & Jurisdictional Differences	0
27. Other (Explain) Retire/Trans in Net Plant-(\$442,980), Op Cashflow L/T Invest.-\$5,650, Op Depr. L/T Invest-(\$113,624)	(550,954)
28. Net Cash Provided/(Used) by Investing Activities	(4,898,832)
29. Net Increase/(Decrease) in Cash	(503,615)
30. Ending Cash	190,614

Revision Date 2010

USDA-RUS OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS	BORROWER DESIGNATION WA0534
INSTRUCTIONS - See RUS Bulletin 1744-2	PERIOD ENDED December, 2014
NOTES TO THE OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS	

USDA-RUS OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS	BORROWER DESIGNATION WA0534
INSTRUCTIONS - See RUS Bulletin 1744-2	PERIOD ENDED December, 2014
CERTIFICATION LOAN DEFAULT NOTES TO THE OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS	

INLAND TELEPHONE COMPANY							54.313(a)(1)
IDAHO OPERATIONS - 472423							
FIVE YEAR FORECAST - NETWORK ADDITIONS							

As they are known to the Company at the date of this Report, the planned investments and forecasted expenses related to Idaho operations (Study Area Code 472423) for the period January 1, 2015 through December 31, 2019, are listed below. The Company expects to use all Universal Service Fund support received in order to fund the expenses related to the provisioning, maintenance and services provided over these upgraded facilities as well as existing facilities and to service the debt with the Rural Utility Service created in order to make these improvements; improving service quality, coverage and capacity. The Company (SAC 472423) received \$384,510 in federal high-cost support for the calendar year ended December 31, 2014. The Company expects that the continued receipt of Universal Service Fund support will aid the Company's efforts to continue to provide the supported services at rates that are comparable to the rates for such services in urban areas of which all customers and potential customers in the Company's designated ETC service area will benefit.

The Company forecasted for 2014, that upgrades to the facilities in its Leon exchange would be \$130,000; upgrading fiber-to-the-node utilizing a ring and upgrading carrier cabinets (shortening loop lengths). The actual cost of the upgrades at its Leon exchange totaled \$554,520. The Company has until October 16, 2016, in order to complete all RUS projects.

		2015	2016	2017	2018	2019
LENORE (836)						
Access Lines (@ 12/31/2014)	258					
Data Subscribers (@ 12/31/2014)	133					
Microwave (Alt/Ethernet)			450,000			
Fiber to the Node			1,000,000			
Electronics			500,000			
TOTAL LENORE			1,950,000			
LEON (224)						
Access Lines (@ 12/31/2014)	25					
Data Subscribers (@ 12/31/2014)	17					
	TOTAL	0	1,950,000	0	0	0
FORECASTED OPERATING EXPENSES						
PLANT SPECIFIC OPERATIONS		300,989	316,032	333,467	353,614	376,839
PLANT NON-SPECIFIC OPERATIONS		55,964	54,857	53,785	52,746	51,739
ACCUMULATED DEPRECIATION		221,295	276,295	276,295	276,295	276,295
CUSTOMER OPERATIONS EXPENSES		68,465	70,200	71,979	73,804	75,676
CORPORATE OPERATIONS EXPENSES		123,956	116,857	110,469	104,732	99,592
	TOTAL OPERATING EXPENSES	770,669	834,241	845,994	861,190	880,140

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.

I, James K. Brooks, being of lawful age, state that I am Treasurer/Controller of Inland Telephone Company ("Company"), that I am authorized to execute this certification on behalf of the Company, and that the facts set forth in this certification are true to the best of my knowledge, information and belief.

On this basis, the Company certifies to the Idaho Public Utilities Commission, pursuant to 47 C.F.R. § 64.2009(e), that the Company's operating procedures are adequate to ensure compliance with the Customer Proprietary Network Information rules and regulations as set forth in 47 C.F.R. §§ 64.2001 through 64.2009.

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), as such standards relate to functionality of wireline carriers in emergency situations. The Company further certifies that it maintains back-up power to ensure functionality without an external power source in the forms of auxiliary generators and batteries in its central offices as well as adequate battery back-up in its subscriber carrier cabinets and that its switching capability is more than adequate to manage the traffic of its subscribers.

For calls within the exchange of Leon, depending upon where a cut is made, there exists redundant toll routing however, the Lenore exchange has no redundant toll routing. In both exchanges, customers can continue to make calls within the exchange should the interexchange interconnected facilities get disconnected. The Company does not have ring technology at this time however; it is looking at redundant routing alternatives for Lenore.

I certify under penalty of perjury under the laws of the State of Idaho that the foregoing is true and correct.

Dated this 29th day of June, 2015 at Roslyn, Washington.

By: _____

James K. Brooks

Treasurer/Controller

Inland Telephone Company

Voice Services Rate Comparability Certification and Residential Lines §54.313(a)(10)

ETCs that are ILEC recipients of high-cost support must report the number of residential service lines for which the sum of the rate and state fees are below \$21.22 as of June 1, 2015. In addition, each ETC, including competitive ETCs, must certify that the pricing of the voice services is no more than \$47.48.

I, James K. Brooks, being of lawful age, state that I am Treasurer/Controller of Inland Telephone Company ("Company"), Study Area Code 472423, that I am authorized to execute this certification on behalf of the Company, and that the facts set forth in this certification are true to the best of my knowledge, information and belief.

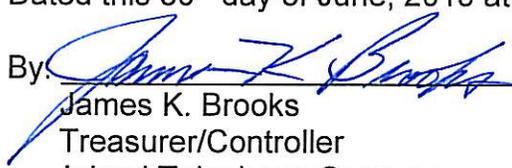
On this basis, the Company certifies, pursuant to 47 C.F.R. § 54.313(a)(10), that the Company's pricing of its voice services is no more than \$47.48.

The Company further submits the following residential service lines and rates; excluding the Federal Subscriber Line Charge of \$6.50:

Exchange	Rate Type	Count	Base Res. Rate	State SLC	State USF Fee	Mand. EAS Charge	Total Per Res.
LENORE (836)	Residential	231	25.76	0	0.16	0	25.92
LENORE (836)	Res-Measured	6	16.00	0	0.16	0	16.16
LEON (224)	Residential	23	25.76	0	0.16	0	25.96
LEON (224)	Res-Measured	1	16.00	0	0.16	0	16.16

I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Dated this 30th day of June, 2015 at Roslyn, Washington.

By: 

James K. Brooks
Treasurer/Controller
Inland Telephone Company

TRIBAL ENGAGEMENT STATEMENT

Although the Lenore exchange service area of Inland Telephone Company, Idaho operations, is within the conventional boundaries of the Nez Perce Tribe reservation, the exchange primarily consists of private property (non-tribal owned). Inland does not serve the areas in which the Nez Perce have their tribal headquarters, administration, enterprises, cultural center and anchor institutions. Inland Telephone Company is an equal opportunity provider and does not ask or keep track of race, creed, color or sexual orientation when providing service; we wouldn't know if a subscriber was a tribal member unless they were claiming Tribal Lifeline.

The Company fully cooperates with the Nez Perce Tribe in matters involving easements, rights of way and any build that may require the possible disturbance of tribal ground; potential archeological study whether the ground is tribally owned or not.