

State of Idaho)
) ss
County of
Latah)

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

AFFIDAVIT OF BUSINESS OR CORPORATE OFFICER

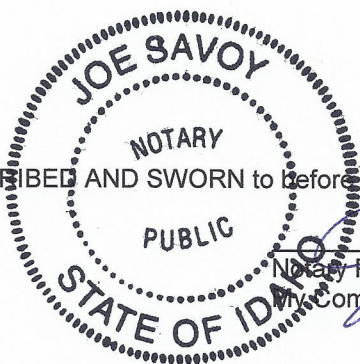
The Idaho Public Utilities Commission Order No. 29841 requires that Eligible Telecommunications Carriers (ETC) certify that it is compliant with applicable service quality standards and consumer protection rules; and ETCs must demonstrate the ability to remain functional in emergencies. In addition,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

1. I am an officer of First Step Internet, LLC, an eligible telecommunications carrier for receiving federal universal service support under section 214(e) of the Telecommunications Act of 1996 in the state of Idaho.
2. I am familiar with the Company's day-to-day operations in the state of Idaho and with the State's service quality standards and consumer protection rules as set forth in Commission Order No. 29841.
3. First Step Internet, LLC is complying with applicable service quality standards and consumer protection rules of the Federal Communications Commission and the Idaho Public Utilities Commission.
4. I certify to the Commission that the Company is able to remain functional in emergencies as set forth in Commission Order No. 29841 and in 47 C.F.R. § 54.201(a)(2).
5. I also certify that all federal universal service support funds received by First Step Internet, LLC during the current calendar year will be used in a manner consistent with section 254(e); that is, for the provision, maintenance, and upgrading of facilities and services for which the support is intended. The company will continue to comply for the period of January 1, 2017, through December 31, 2017, to be eligible for federal universal service fund support.
6. This verification and affidavit is provided to be the Idaho Public Utilities Commission to enable the IPUC to certify to the FCC that federal universal service support received by the eligible carriers in the state will be used in a manner consistent with Section 254(e) of the Telecommunications Act.

Kevin Owen / President
Name/Title

6/30/2016
Date

SUBSCRIBED AND SWORN to before me this 30th day of June



Notary Public for IDAHO, residing at Latah County
My Commission expires 12/18/17

Ability to Function in Emergency Situations

First Step Internet, LLC (“First Step”) has at least four hours of back up battery power at each cell site, backup generators at each microwave hub, and at least five hours back up battery power and backup generators at each switch. FSI will have the ability to remain functional in emergency situations as required by FCC rules. Specifically, FSI will have adequate amounts of back-up power to ensure functionality without an external power source, and FSI maintains a redundant middle-mile/backbone network with redundant paths and network rings. Power outage protection is available at all site either by means of significant battery backup or gas-powered generators.

**Statement of Compliance with Applicable Service Quality Standards and
Consumer Protection Rules – First Step Internet, LLC – June 2016**

1. Service Quality Standards: First Step works to exceed all requisite levels of service quality to customers served through Rural Broadband (RBE) experiment deployments both through automated monitoring and manual random testing. Specifically, throughput to a customer is regularly tested at random times of day in order to ensure that transmission speeds continue to meet or exceed the 10x1 service profile, and automated testing throughout the entire day constantly measures round-trip latency to customers in order to verify that our goal of 100ms or less average RTT (95th percentile) between them and our internet ingress/egress points is maintained. We have based our latency targets, as well as the accompanying testing methodologies, on the method set forth in the FCC's Report and Order from October 31, 2013 (WC Docket No. 10-90, DA 13-2115, ¶19) as our own goals and targets. We are also continually working to improve and refine our tests and procedures to increase accuracy as well as visibility into problems when they arise.
2. Consumer Protection Rules: As a telecommunications carrier and interconnected VoIP provider, First Step is already required to comply with the protection rules set forth in 47 C.F.R. § 64.2001-2011, and we certify our compliance with these rules annually by filing with the Enforcement Bureau under docket 06-36. A copy of our most recent filing, which includes a detailed description of our operating procedures for ensuring compliance, at the FCC Enforcement Bureau's Customer Proprietary Network Information (CPNI) site, <http://apps.fcc.gov/eb/CPNI> – search under our 499 Filer ID (829017) and look for confirmation #46578132. Previous years' annual certifications were filed via the Electronic Comment Filing System (ECFS).

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Consumer Protection Rules – First Step Internet, LLC – June 2016**

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**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	476222
<015>	Study Area Name	First Step Internet, LLC
<020>	Program Year	2017
<030>	Contact Name: Person USAC should contact with questions about this data	Kevin W Owen
<035>	Contact Telephone Number: Number of the person identified in data line <030>	2088828869 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	kowen@fsr.com
	Form Type	54.313

**(100) Service Quality Improvement Reporting
Data Collection Form**

FCC Form 481

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

July 2013

<010>	Study Area Code	476222
<015>	Study Area Name	First Step Internet, LLC
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Kevin W Owen
<035>	Contact Telephone Number - Number of person identified in data line <030>	2088828869 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	kowen@fsr.com

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

If your answer to Line <111> is yes, please 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.

481 Narrative.pdf

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
- <114> Report how much universal service (USF) support was received
- <115> How much (USF) was used to improve service quality and how support was used to improve service quality
- <116> How much (USF) was used to improve service coverage and how support was used to improve service coverage
- <117> How much (USF) was used to improve service capacity and how support was used to improve service capacity
- <118> Provide an explanation of network improvement targets not met in the prior calendar year.

Yes
Yes
Yes
Yes
Yes
Yes

<010>	Study Area Code	476222
<015>	Study Area Name	First Step Internet, LLC
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<030>	Contact Name - Person USAC should contact regarding this data	Kevin W Owen
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<039>	Contact Email Address - Email Address of person identified in data line <030>	kowen@fsr.com

No

Page 3

**(300) Unfulfilled Service Request
Data Collection Form**FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	476222
<015>	Study Area Name	First Step Internet, LLC
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<030>	Contact Name - Person USAC should contact regarding this data	Kevin W Owen
<035>	Contact Telephone Number - Number of person identified in data line <030>	2088828869 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	kowen@fsr.com

<300> Unfulfilled service request (voice)

0

<310> Detail on attempts (voice)

Name of Attached Document

<320> Unfulfilled service request (broadband)

0

<330> Detail on attempts (broadband)

Name of Attached Document

<010>	Study Area Code	476222
<015>	Study Area Name	First Step Internet, LLC
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Kevin W Owen
<035>	Contact Telephone Number - Number of person identified in data line <030>	2088828869 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	kowen@fsr.com
<400>	Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed voice	
<410>	Complaints per 1000 customers for fixed voice	0 . 0
<420>	Complaints per 1000 customers for mobile voice	
<430>	Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed broadband	
<440>	Complaints per 1000 customers for fixed broadband	0 . 0
<450>	Complaints per 1000 customers for mobile broadband	

<010>	Study Area Code	476222
<015>	Study Area Name	First Step Internet, LLC
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Kevin W Owen
<035>	Contact Telephone Number - Number of person identified in data line <030>	2088828869 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	kowen@fsr.com
<500>	Certify compliance with applicable service quality standards and consumer protection rules	Yes
481 Statement of Compliance (00025082@xA90E1).pdf		
<510>	Descriptive document for Service Quality Standards & Consumer Protection Rules Compliance	

(600) Functionality in Emergency Situations		FCC Form 481
Data Collection Form		OMB Control No. 3060-0986/OMB Control No. 3060-0819
		July 2013

<010>	Study Area Code	476222
<015>	Study Area Name	First Step Internet, LLC
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Kevin W Owen
<035>	Contact Telephone Number - Number of person identified in data line <030>	2088828869 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	kowen@fsr.com
<600>	Certify compliance regarding ability to function in emergency situations	Yes
<610>	Descriptive document for Functionality in Emergency Situations	Ability to Function in Emergency Situations.pdf

<010>	Study Area Code	476222
<015>	Study Area Name	First Step Internet, LLC
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Kevin W Owen
<035>	Contact Telephone Number - Number of person identified in data line <030>	2088828869 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	kowen@fsr.com

-- See attached worksheet --

<010>	Study Area Code	476222
<015>	Study Area Name	First Step Internet, LLC
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<030>	Contact Name - Person USAC should contact regarding this data	Kevin W Owen
<035>	Contact Telephone Number - Number of person identified in data line <030>	2088828869 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	kowen@fsr.com
<810>	Reporting Carrier	First Step Internet, LLC
<811>	Holding Company	First Step Internet, LLC
<812>	Operating Company	First Step Internet, LLC

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

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

<010>	Study Area Code	476222
<015>	Study Area Name	First Step Internet, LLC
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Kevin W Owen
<035>	Contact Telephone Number - Number of person identified in data line <030>	2088828869 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	kowen@fsr.com

<900> Does the filing entity offer tribal land services? (Y/N) No

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

<920> Tribal Government Engagement Obligation

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

**(1000) Voice and Broadband Service Rate Comparability
Data Collection Form**

FCC Form 481

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

July 2013

<010>	Study Area Code	476222
<015>	Study Area Name	First Step Internet, LLC
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Kevin W Owen
<035>	Contact Telephone Number - Number of person identified in data line <030>	2088828869 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	kowen@fsr.com

<1000> Voice services rate comparability certification Yes

<1010> Attach detailed description for voice services rate comparability compliance Attachment C.pdf

Name of Attached Document

<1020> Broadband comparability certification Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau

<1030> Attach detailed description for broadband comparability compliance Attachment B.pdf

Name of Attached Document

**(1100) No Terrestrial Backhaul Reporting
Data Collection Form**

FCC Form 481

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

July 2013

<010>	Study Area Code	476222
<015>	Study Area Name	First Step Internet, LLC
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Kevin W Owen
<035>	Contact Telephone Number - Number of person identified in data line <030>	2088828869 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	kowen@fsr.com

<1100> Certify whether terrestrial backhaul options exist (Y/N)

Yes

<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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<015>	Study Area Name	First Step Internet, LLC
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Kevin W Owen
<035>	Contact Telephone Number - Number of person identified in data line <030>	2088828869 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	kowen@fsr.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP

"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, | <input type="checkbox"/> |
| <1222> Details on the number of minutes provided as part of the plan, | <input type="checkbox"/> |
| <1223> Additional charges for toll calls, and rates for each such plan. | <input type="checkbox"/> |

(2000) Price Cap Carrier Additional Documentation

FCC Form 481

Data Collection Form

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

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

July 2013

<010>	Study Area Code	476222
<015>	Study Area Name	First Step Internet, LLC
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Kevin W Owen
<035>	Contact Telephone Number - Number of person identified in data line <030>	2088828869 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	kowen@fsr.com

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental 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) - Note that for the July 1 2016 certification, this applies to Round 2 recipients of Incremental Support
- <2011> 3rd Year Certification 47 CFR § 54.313(b)(1)(ii) - Note that for the July 1 2016 certification, this applies to Round 1 recipients of Incremental Support
- <2022> Recipient certifies, representing year two after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients only.
- <2023> The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year two - 54.313(b)(2)(ii). Round 2 recipients only.
- <2024A> Round 2 Recipient of Incremental Support?
- <2024B> Attach list of census blocks indicating where funding was spent in year two - 54.313(b)(2)(ii). Round 2 recipients only.
- <2025A> Round 1 or Round 2 Recipient of Incremental Support?
- <2025B> Attach geocoded Information for Phase I milestone reports (Round 1 for year three and Round 2 for year two) - Connect America Fund , WC Docket 10-90, Report and Order, FCC 13-
- <2015> 2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)

Name of Attached Document Listing
Required Information

Name of Attached Document Listing
Required Information

(2000) Price Cap Carrier Additional Documentation (Continued)

FCC Form 481

Data Collection Form

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

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

July 2013

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)}

<2017A> Connect America Fund Phase II recipient?

<2017B> Attach information for Phase II - 54.313(e)(1) - list of geocoded locations already meeting the 54.309 public interest obligations at the end of calendar year 2015 and total amount of Phase II support, if any, the price

Name of Attached Document Listing
Required Information

cap carrier used for capital expenditures in 2015.

<2018> Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(2)(ii)

Name of Attached Document Listing
Required Information

<2019> Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(2)(v)

<2020> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 40% of its supported locations in the state on December 31, 2017 - 54.313(e)(3)

<2021> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 60% of its supported locations in the state on December 31, 2018 - 54.313(e)(4)

<2026> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 80% of its supported locations in the state on December 31, 2019 - 54.313(e)(5)

<2027> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 100% of its supported locations in the state on December 31, 2020 - 54.313(e)(6)

(3005) Rate Of Return Carrier Additional Documentation
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>	kowen@fsr.com

Complete the items below to note compliance with 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.

(3009)	Progress Report on 5 Year Plan Carrier certifies to 54.313(f)(1)(iii)		
(3010A)	Milestone Certification {47 CFR § 54.313(f)(1)(i)}		
(3010B)	Please Provide Attachment	Name of Attached Document Listing Required Information	<div></div>
(3012A)	Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}		
(3012B)	Please Provide Attachment	Name of Attached Document Listing Required Information	<div></div>
(3013)	Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)}	(Yes/No)	<input type="radio"/> <input type="radio"/>
(3014)	If yes, does your company file the RUS annual report	(Yes/No)	<input type="radio"/> <input type="radio"/>
	Please check these boxes to confirm that the attached PDF, 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)		<input type="checkbox"/>
(3016)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	Name of Attached Document Listing Required Information	<div></div>
(3018)	If the response is no on line 3014, is your company audited?	(Yes/No)	<input type="radio"/> <input type="radio"/>
	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 Borrowers		<input type="checkbox"/>
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3021)	Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit.		<input type="checkbox"/>
	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		<input type="checkbox"/>
(3023)	Underlying information subjected to a review by an independent certified public accountant		<input type="checkbox"/>
(3024)	Underlying information subjected to an officer certification.		<input type="checkbox"/>
(3025)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3026)	Attach the worksheet listing required information	Name of Attached Document Listing Required Information	<div></div>

(3005) 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

<010>	Study Area Code	476222
<015>	Study Area Name	First Step Internet, LLC
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<035>	Contact Telephone Number - Number of person identified in data line <030>	2088828869 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	kowen@fsr.com

Financial Data Summary

(3027) Revenue

(3028) Operating Expenses

(3029) Net Income

(3030) Telephone Plant In Service(TPIS)

(3031) Total Assets

(3032) Total Debt

(3033) Total Equity

(3034) Dividends

<010>	Study Area Code	476222
<015>	Study Area Name	First Step Internet, LLC
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Kevin W Owen
<035>	Contact Telephone Number - Number of person identified in data line <030>	2088828869 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	kowen@fsr.com

4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission’s public interest obligations. All RBE participants must provide a response to Line 4001.

4001. Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

Yes

Community Anchor Institutions – FCC 14-98 (paragraph 79)

4003a. RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

No - No New Anchors

If yes to 4003A, please provide a response for 4003B.

4003b. Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year.

Name of Attached Document Listing Required Information

Broadband Deployment Locations – FCC 14-98 (paragraph 80)

4004a. Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481.

Name of Attached Document Listing Required Information

RBE_Line_4004A_Deployed_Locations.xlsx

4004b. Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband speed and data usage allowances available in the relevant geographic area.

Name of Attached Document Listing Required Information

FSI pricing.pdf

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010> Study Area Code	476222
<015> Study Area Name	First Step Internet, LLC
<020> Program Year	2017
<030> Contact Name - Person USAC should contact regarding this data	Kevin W Owen
<035> Contact Telephone Number - Number of person identified in data line <030>	2088828869 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	kowen@fsr.com

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: First Step Internet, LLC	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier: 476222	Filing Due Date for this form: 07/01/2016
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

<010> Study Area Code	476222
<015> Study Area Name	First Step Internet, LLC
<020> Program Year	2017
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<039> Contact Email Address - Email Address of person identified in data line <030>	kowen@fsr.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	
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.	
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:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
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.	

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	
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.	
Name of Reporting Carrier:	
Name of Authorized Agent Firm:	
Signature of Authorized Agent or Employee of Agent:	Date:
Name of Authorized Agent Employee:	
Title or position of Authorized Agent or Employee of Agent:	
Telephone number of Authorized Agent or Employee of Agent:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
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.	

Attachments

(710) Broadband Price Offerings Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

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

July 2013

<015>	Study Area Name	First Step Internet, LLC
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<030>	Contact Name - Person USAC should contact regarding this data	Kevin W Owen
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<039> Contact Email Address - Email Address of person identified in data line <030> kowen@fsr.com

<711>	<a1>	<a2>	<b1>	<b2>	<c>	<d1>	<d2>	<d3>	<d4>
-------	------	------	------	------	-----	------	------	------	------

(800) Operating Companies	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

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

July 2013

<010>	Study Area Code	476222
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<039>	Contact Email Address - Email Address of person identified in data line <030>	kowen@fsr.com
<810>	Reporting Carrier	First Step Internet, LLC
<811>	Holding Company	First Step Internet, LLC
<812>	Operating Company	First Step Internet, LLC

[illegible]

Attachment A



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Available for both Residents and Businesses, First Step Internet uses LTE technology to deliver High-Speed Internet service. LTE Service available in select areas, please contact FSI for More Information <http://www.fsr.com/lte/> or by phone 208 882 8869.

Speed Plan	Setup and Installation	Monthly Pricing
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*Standard LTE equipment and installation at no cost to the customer. If it is determined that an additional or higher powered equipment is needed an installation fee may occur at that time. FSI owns all equipment.

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* Limited time offer

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Standard High-Speed Wireless Internet

Idaho

Bovill, Cavendish, Clearwater, Cottonwood, Craigmont, Deary, Elk City, Ferdinand, Fernwood, Genesee, Grangeville, Green Creek, Harvard, Harpster, Helmer, Juliaetta, Kamiah, Kendrick, Lewiston, Moscow, Nezperce, Orofino, Potlatch, Princeton, Southwick, Troy, Viola, Weippe, Winchester

Washington

Albion, Asotin, Clarkston, Colfax, Colton, Farmington, Garfield, Johnson, Palouse, Oakesdale, Pomeroy, Pullman, Rosalia, Steptoe, Tekoa, Uniontown

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4.0Mbps/ 2.0Mbps	\$50 setup + 1st Month Free + \$40/mo	\$40.00/mo
6.0Mbps/ 3.0Mbps	\$50 setup + 1st Month Free + \$50/mo	\$50.00/mo
8.0Mbps/ 4.0Mbps	\$50 setup + 1st Month Free + \$80/mo	\$80.00/mo

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First Step Internet, LLC
FCC Registration Number: **0010766228**
FCC SAC: 476222

Rural Broadband Experiments Deployment Update as of June 1, 2016.

This Rural Broadband Experiment (“RBE”) Annual Report is provided with First Step Internet, LLC’s (“First Step”) Form 481 for 2016. First Step was awarded \$415,855.63 in Category Two Rural Broadband Experiment funding. In the case of FSI, the RBE award was first announced on September 11, 2015 and the first disbursement was issued on September 29, 2015.

Paragraph 80 of the RBE Report and Order (“RBE R&O”) states that all recipients of rural broadband experiments funding must “file with their annual reports evidence demonstrating to which locations they have deployed facilities.”¹ The following update provides the requested information. All of the information provided herein is current as of June 1, 2016.

Description of the Status of First Step Internet’s Project

In the Rural Broadband Experiments, the FCC made “\$15 million available for projects where the provider would offer at least one service plan that provides 10 Mbps downstream/1 Mbps upstream to all locations within the selected census blocks. This service plan also must offer at least a 100 GB usage allowance, no more than 100 ms of latency, and meet the reasonable comparability benchmarks for the pricing of voice and broadband.”² In addition, the FCC afforded recipients “the option of accelerating disbursement of support for winning bidders in the experiments for those entities that commit to deploying to at least 25 percent of the requisite number of locations within the first 15 months.”

First Step elected the accelerated funding distribution and on September 30, 2015 received the bulk payment amount of \$127,182.32. First Step received \$2,425.82/month for the remaining 3 months of the year amounting to an additional \$7,277.46 for a total of \$134,459.78 in 2015 funding. As of December 31, 2015 a total of \$111,970.30 was expensed against the RBE grant funding.

Construction and Deployment to Covered Census Blocks

Service was deployed via Telrad LTE microwave broadband wireless equipment. The Telrad equipment was mounted on existing First Step towers. Where necessary, additional battery backup equipment was installed to provide for longer run times in the event of a power failure. Some additional backhaul capacity and redundancy were added in locations where it was necessary to increase availability and overall network capacity.

¹ *Connect America Fund; ETC Annual Reports and Certifications*, Report and Order and Further Notice of Proposed Rulemaking, WC Docket No. 10-90; WC Docket No. 14-58 (rel. July 14, 2014) at para. 80.

² *Id.* at para. 27.

Based on First Step's predicted RF propagation, [see attached map] First Step has made broadband connections available to end user premises to 111 of the funded 116 census blocks. (~95%). We have one final tower location remaining to activate service. Once service at that location is established, we will have made service to 100% of the required census blocks. For purposes of this report, First Step considers broadband connections to be "available" to the census block based on the criteria described in FCC Form 477 – namely that First Step does, or could, within a service interval that is typical for that type of connection, provision two-way data transmission to and from the Internet with advertised speeds that meet RBE requirements. On the provided maps, those census blocks where qualifying broadband is not "available" are shaded in red, while those blocks where qualifying broadband is "available" are shaded in light blue. First Step is in the process of compiling a list of eligible locations in each of the census blocks.

90% of the provided support was used to expand the available services in the region to cover those blocks that had no other options for broadband services. This was the primary focus of the use of the support. This allowed for broadband service of 10/1 to be offered to many customer that otherwise had no option for broadband. The 10/1 LTE service offered is offered at a cost of \$75/month with no data caps or usage restrictions.

The remaining 10% of support was used to improve service quality and capacity.

All planned network build targets were met for the calendar year. In fact, First Step is well ahead of its planned network deployment. 100% of the network will be completed in the upcoming year and the focus will then shift dramatically to improving quality and increasing capacity. These plans will be undertaken with a review of the operating QOS statistics of the network and adjustments will be made as necessary and required.

Evidence of Meeting Public Service Obligations

- 1) **Minimum Speeds**: Category Two recipients must offer at least one service plan that provides 10 Mbps downstream/1 Mbps upstream to all locations within the selected census blocks. Attached at Exhibit A are screenshots from First Step's website demonstrating that First Step offers and advertises at least one plan that meets this criterion. [see attached screen shot from www.fsr.com website]
- 2) **Minimum Usage Allowance**: Category Two recipients must offer within the service plan a monthly usage allowance of at least 100 GB. Attached at Exhibit B are screenshots from First Step's website demonstrating that First Step offers and advertises a 10/1 plan with at unlimited data. [see attached screen shot from www.fsr.com website]
- 3) **Latency**: The RBE R&O requires RBE participants to certify that 95 percent or more of all peak period measurements of network round trip latency are at or below 100 ms. Based on its internal testing, First Step certifies that its network latency satisfies this requirement.

- 4) Reasonable Comparability Benchmark: Under the RBE program, First Step is required to offer broadband service at rates that are at or below the relevant reasonable comparability benchmark. The current benchmark for basic residential voice services is no more than \$41.07, while the current benchmark for broadband services with speeds of 10 Mbps downstream and 1 Mbps upstream and an unlimited usage allowance is \$75.20.³ Attached at Exhibit C are screenshots from First Step's website demonstrating that First Step's pricing for voice and broadband services satisfies the reasonable comparability benchmark. [see attached screen shot from www.fsr.com website]

³ *Wireline Competition Bureau Announces Results of 2016 Urban Rate Survey for Fixed Voice and Broadband Services, Posting of Survey Data and Explanatory Notes, and Required Minimum Usage Allowance for ETCs Subject to Broadband Public Interest Obligations*, Public Notice, WC Docket No. 10-90 (rel. April 5, 2016).

This map of Washington state illustrates the distribution of the Pacific Northwest Coast Range (PNCR) and the Pacific Northwest Coast Range (PNCR) in green. The map includes major cities, roads, and geographical features like the Coast Range and the Pacific Northwest Coast Range.

Attachment A



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Attachment B



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Business SIP Trunk services available.

Existing Phone system Integration.

VOIP Requires at least a 4mbps/2mbps internet connection, router, and VoIP Modem. You may use standard analog phone to plug into the VoIP Modem.

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Call anywhere in the Continental U.S. for free.

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Universal Voicemail Number

Add additional numbers

Call Forwarding

Emergency Call Forwarding

Caller ID

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Block Anonymous Calls

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