

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 22, 2020

Via electronic filing to: diane.hanian@puc.idaho.gov

Ms. Diane Hanian
Commission Secretary
Idaho Public Utilities Commission
472 West Washington Street
Boise, Idaho 83720

RECEIVED
2020 JUN 22 PM 3:39
IDAHO PUBLIC
UTILITIES COMMISSION

RE: 2019 Eligible Telecommunications Carrier (ETC) Annual Reporting
Requirements with the IPUC/ 2020 ETC Re-Certification

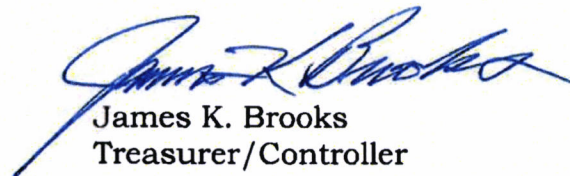
Dear Ms. Hanian:

Inland Telephone Company hereby provides notice to the Idaho Public Utilities Commission ("Commission") that it has electronically completed and submitted the FCC Form 481 to the Universal Service Administrative Corporation ("USAC") and the Federal Communications Commission ("FCC") for carriers designated as an Eligible Telecommunications Carrier, in accordance with 47 C.F.R. §§ 54.313 and 54.422.

I have also included the signed Affidavit pursuant to Commission Order 29841. Inland Telephone 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, §§ 54.301, 54.305, and Part 36, sub-part F.

Please review the FCC Form 481 filing and include Inland Telephone Company in your Annual Use Certification Letter to USAC and the FCC. If you should have any questions, do not hesitate to contact me directly.

Sincerely,


James K. Brooks
Treasurer/Controller

Enclosures

State of Washington)
) ss
County of Kittitas)

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 Inland Telephone Company, an eligible telecommunications carrier for receiving federal universal service support under section 214(e) of the Telecommunications Act of 1996 in the state of Idaho.
2. I am familiar with the Company's day-to-day operations in the state of Idaho and with the State's service quality standards and consumer protection rules as set forth in Commission Order No. 29841.
3. Inland Telephone Company is complying with applicable service quality standards and consumer protection rules of the Federal Communications Commission and the Idaho Public Utilities Commission.
4. I certify to the Commission that the Company is able to remain functional in emergencies as set forth in Commission Order No. 29841 and in 47 C.F.R. § 54.201(a)(2).
5. I also certify that all federal universal service support funds received by Inland Telephone Company during the current calendar year will be used in a manner consistent with section 254(e); that is, for the provision, maintenance, and upgrading of facilities and services for which the support is intended. The company will continue to comply for the period of January 1, 2021, through December 31, 2021, 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.

James K. Brooks
James K. Brooks, Treasurer/Controller

06/22/2020
Date

SUBSCRIBED AND SWORN to before me this 22 day of June, 2020

Pamela R. Nelson
Pamela R. Nelson

Notary Public in and for the state of Washington,

residing at Deer River

My Commission expires Sept. 9, 2023



**FCC Form 481 - Carrier Annual Reporting
Data Collection Form**FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2018

<010> Study Area Code	472423
<015> Study Area Name	INLAND TEL-ID
<020> Program Year	2021
<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
Form Type	54.313 and 54.422

(400) Number of Complaints per 1,000 customers
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2018

<010>	Study Area Code	472423
<015>	Study Area Name	INLAND TEL-ID
<020>	Program Year	2021
<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
<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.	
<410>	Complaints per 1000 customers for fixed voice	
<420>	Complaints per 1000 customers for mobile voice	

[500] Compliance With Service Quality Standards and Consumer Protection Rules
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2018

<010>	Study Area Code	472423
<015>	Study Area Name	INLAND TEL-ID
<020>	Program Year	2021
<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
<515>	Certify compliance with applicable minimum service standards	

**(600) Functionality in Emergency Situations
Data Collection Form**FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2018

<010> Study Area Code	472423
<015> Study Area Name	INLAND TEL- ID
<020> Program Year	2021
<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
<600> Certify compliance regarding ability to function in emergency situations	Yes
<610> Descriptive document for Functionality in Emergency Situations	472423 ID FUNCTIONAL IN EMERGENCY CERTIFICATION IN 610.pdf

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

**FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2018**

<010> Study Area Code 472423
 <015> Study Area Name INLAND TEL- ID
 <020> Program Year 2021
 <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

<900> Does the filing entity offer tribal land services? (Y/N)

Nez Perce

472423 ID TRIBAL ENGAGEMENT STATEMENT LN 920.pdf, 472423 ID EAGLE RIVER-TRIBAL EXAMPLE LN 920.pdf

Name of Attached Document

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

<920> Tribal Government Engagement Obligation

If your company serves Tribal lands, please select (Yes, No, NA) for each of these boxes to confirm the status described on the attached PDF, on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(5) 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
Yes
Yes
Yes
Yes
Yes
Yes

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

FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2018

<010> Study Area Code 472423
 <015> Study Area Name INLAND TEL-ID
 <020> Program Year 2021
 <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

<1000> Voice services rate comparability certification Yes

<1010> Attach detailed description for voice services rate comparability compliance

472423 ID VOICE RATE COMPARABILITY CERTIFICATION LN 1010.pdf

Name of Attached Document

Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau

<1020> Broadband comparability certification

<1030> Attach detailed description for broadband comparability compliance

472423 ID BROADBAND RATE COMPARABILITY CERTIFICATION LN 1030.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 2018

<010>	Study Area Code	472423
<015>	Study Area Name	INLAND TEL-ID
<020>	Program Year	2021
<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

Yes

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

<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).

<1140> Alaska Plan rate-of-return certification (yes, no, or not applicable) of compliance with approved performance plan.

**(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 2018

<010> Study Area Code 472423
 <015> Study Area Name INLAND_TEL-ID
 <020> Program Year 2021
 <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



Name of Attached Document

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

<1220> Link to Public Website HTTP inlandnetworks.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.

(2005) Price Cap Carrier Additional Documentation

Data Collection Form

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

FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2018

<010>	Study Area Code	472423
<015>	Study Area Name	INLAND TEL- ID
<020>	Program Year	2021
<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

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of 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(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

<2015> 2016 and future Frozen Support Certification 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)}

<2017A> Connect America Fund Phase II recipient?

<2017C> Total amount of Phase II support, if any, the price cap carrier used for capital expenditures in 2018.

<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)(1)(ii)(A)

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)(1)(ii)(C)

**(3005) Rate Of Return Carrier Additional Documentation
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2018

<010> Study Area Code 472423

<015> Study Area Name INLAND TEL- ID

<020> Program Year 2021

<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

(3007) Does this filing retain a Cost Consultant and/or Firm, or other Third Party to prepare financial and operations data disclosures submitted to the National Exchange Carrier Association (NECA), USAC, or the Administrator?

(3007a)	(3007b)
Name of Consultant	Name of Consultant Firm/Third Party

CAF BLS Reporting

(3008A) Please indicate whether new locations were deployed during the prior calendar year. (Yes/No)

(3008B) Please enter the number of newly deployed locations in the prior calendar year associated with each of the following speed tiers.

(3008B1) Number of newly deployed locations with access to broadband speeds of at least 10/1 Mbps but less than 25/3 Mbps.

(3008B2) Number of newly deployed locations with access to broadband speeds of 25/3 Mbps or higher.

(3008C) Please provide the percentage of deployment across the entire study area.

<010>	Study Area Code	472423
<015>	Study Area Name	INLAND TEL-ID
<020>	Program Year	2021
<030>	Contact Name - Person USAC should contact regarding this data	James K. Brooks
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<039>	Contact Email Address - Email Address of person identified in data line <030>	jbrooks@inlandnet.com

Select from the drop down menu or check the boxes below to note compliance with 54.313(f)(1). Privately held carriers must ensure 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.

Progress Report on 5 Year Plan

(3009) Carrier certifies to 54.313(f)(1)(iii)

Yes - Attach Certification

(3010A) Certification of Public Interest Obligations {47 CFR § 54.313(f)(1)(i)}

(3010B) Please Provide Attachment

Name of Attached Document Listing Required Information

472423 ID CERTIFICATION OF PUBLIC INTEREST OBLIGATIONS LN 3010B.pdf

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

No - No New Community Anchors

(3012B) Please Provide Attachment

Name of Attached Document Listing Required Information

(3013) Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)}

(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 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)

(3016) Document(s) with 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

Name of Attached Document Listing Required Information

472423 ID RUS ANNUAL REPORT LN 3017.pdf

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

(3019) 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: Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers

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

(3021) Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit.

(3022) 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: 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) with Balance Sheet, Income Statement and Statement of Cash Flows

(3026) Attach the worksheet listing required information

Name of Attached Document Listing Required Information

(3005) Rate Of Return Carrier Additional Documentation (Continued)
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2018

<01D>	Study Area Code	472423
<01S>	Study Area Name	INLAND TEL- ID
<02D>	Program Year	2021
<03D>	Contact Name - Person USAC should contact regarding this data	James K. Brooks
<03S>	Contact Telephone Number - Number of person identified in data line <03D>	5096492211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <03D>	jbrooks@inlandnet.com

Financial Data Summary	
(3027) Revenue	6090589
(3028) Operating Expenses	5298413
(3029) Net Income	528500
(3030) Telephone Plant In Service(TPIS)	34950329
(3031) Total Assets	23650868
(3032) Total Debt	13050940
(3033) Total Equity	8611586
(3034) Dividends	0

<010>	Study Area Code	472423
<015>	Study Area Name	INLAND TEL-ID
<020>	Program Year	2021
<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

4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations and provide a list of newly served community anchor institutions.

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 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.

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.

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

<010>	Study Area Code	472423
<015>	Study Area Name	INLAND TEL-ID
<020>	Program Year	2021
<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>	5094492211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jbrooks@inlandnet.com

5005 Alaska Plan

(5011) Please indicate whether any terrestrial backhaul or other satellite backhaul became commercially available in the previous calendar year in areas previously served exclusively by performance-limiting satellite backhaul. (Yes/No)

(5012) If the filing carrier identified in its approved performance plans that it relies exclusively on satellite backhaul for a certain portion of the population in its service area, indicate whether any terrestrial backhaul or other satellite backhaul became commercially available in the previous calendar year in areas that were previously served exclusively by satellite backhaul. (Yes/No)

<5013>	<a>		<c>
	Description Of Backhaul Technology	Date Backhaul Available	Newly Served Locations or Population

(6005) Phase II Auction Reporting
Data Collection

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
April 2020

<010> Study Area Code 472423

<015> Study Area Name INLAND TEL- ID

<020> Program Year 2021

<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

<6010> Total amount of Phase II auction support,
if any, the phase II Auction recipient carrier used
for capital expenditures in the previous calendar year

<6011> Phase II Auction recipient performance requirements certification (Yes/No)

**(7005) Phase-Down Support Reporting
Data Collection**

**FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
April 2020**

<010>	Study Area Code	472423
<015>	Study Area Name	INLAND TEL- ID
<020>	Program Year	2021
<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

<7010> Price Cap Carrier and Fixed Competitive Eligible Telecommunications Carrier (Yes/No)
Phase-Down support requirement certification

**Certification - Reporting Carrier
Data Collection Form**
**FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2018**

<010>	Study Area Code	472423
<015>	Study Area Name	INLAND TEL-ID
<020>	Program Year	2021
<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 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:	Date
Printed name of Authorized Officer: James Brooks	
Title or position of Authorized Officer: Treasurer	
Telephone number of Authorized Officer: 5096492211 ext.	
Study Area Code of Reporting Carrier: 472423	Filing Due Date for this form: 07/01/2020
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 2018
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<010> Study Area Code	472423
<015> Study Area Name	INLAND TEL-ID
<020> Program Year	2021
<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	
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

**INLAND TELEPHONE COMPANY - ID
STUDY AREA CODE 472423
ATTACHMENTS TO THE FCC FORM 481**

LINE 610 - FUNCTIONALITY IN EMERGENCY SITUATIONS

(472423 ID FUNCTIONAL IN EMERGENCIES CERTIFICATION LN 610.pdf)

Ability to Remain Functional in Emergencies Certification
§54.313(a)(1)

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.

§54.202(a)(2) Demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute 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")(SAC 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 that it maintained the ability to function in emergency situations under the standard found in [Idaho Public Utilities] Commission Order No. 29841 and in 47 C.F.R. §54.202(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. The Company's 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; the Company is always looking for redundant routing alternatives.

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

Dated this 22nd day of June, 2020 in Roslyn, Washington.

By: _____

James K. Brooks

Treasurer/Controller

Inland Telephone Company

LINE 920 - TRIBAL GOVERNMENT ENGAGEMENT OBLIGATION

(472423 ID TRIBAL ENGAGEMENT STATEMENT LN 920.pdf)

(472423 ID EAGLE RIVER-TRIBAL EXAMPLE LN 920.pdf)

TRIBAL ENGAGEMENT STATEMENT

Although the Lenore, Idaho exchange service area of Inland Telephone Company, Study Area Code 472423, is within the historical boundaries of the Nez Perce Tribe reservation, the exchange primarily consists of private property (non-tribally owned). The Company did not perform a needs assessment, deployment planning, feasibility, or sustainability planning with a focus on Tribal community anchor institutions since the Company's exchange boundary does not encompass the areas in which the Nez Perce have their tribal headquarters, administration, enterprises, cultural center, hatchery, or any anchor institutions.

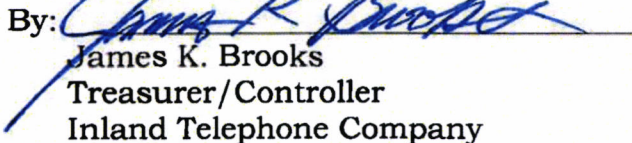
As for subscribers, the Company would not know if a subscriber was a tribal member unless they were claiming Tribal Lifeline. Inland Telephone Company is an equal opportunity provider and does not ask or keep track of race, sex, age, religion, national origin, gender identity, sexual orientation, or any other basis that is prohibited by federal, state, or local laws when providing service; to keep track of this information may be considered profiling which the Company does not engage in.

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.

Attached is a copy of correspondence from a contractor, Eagle River Development LLC, contracted by the Company to perform a study compliant to the National Environmental Policy Act for a proposed tower site. The study demonstrates that although the proposed tower site is not on tribal owned property, the Company sought Section 106 concurrence from the Nez Perce Tribe as it is located within the historical boundaries of the Nez Perce Reservation.

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

Dated this 22nd day of June, 2020 in Roslyn, Washington.

By: 
James K. Brooks
Treasurer/Controller
Inland Telephone Company



Inland Telephone Company New 185' Lattice Antenna Tower: Lenore, ID

Mr. Bob Hillweg
Inland Telephone Company
P.O. Box 171
Roslyn, WA 98941

**RE: Proposed New-Build 185' Lattice Antenna Tower Site: Lenore, ID: NEPA Checklist Summary Report
Site Location: NW 1/4 Section 32, Township 37 North, Range 01 West B.M., Nez Perce County,
ID.
Eagle River Development, LLC Project: 1511E**

Dear Mr. Hillweg:

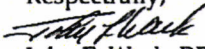
Eagle River Development, LLC at Inland Telephone Company request prepared a NEPA Checklist and Summary Report, Archaeological/Cultural Resource Field Survey, THPO/SHPO Archive Research, THPO Concurrence Letter and Tribal Notifications including FCC Form 620 submission package for the proposed 185' lattice antenna tower and property owned by Inland Telephone Company located approximately 4 miles southeast of Lenore, Idaho within the Nez Perce Indian Reservation in the NW 1/4 of Section 32, Township 37 North, Range 01 West, B.M. Nez Perce County, Idaho.

The National Environmental Policy Act (NEPA) Checklist and Reviews (report attached) did not reveal Section 106 adverse effects for the project pertaining to direct and visual effects for the undertaking. Even though no direct or visual effects on cultural resources for the subject site and property the Nez Perce THPO (Keith Baird) has delayed Section 106 concurrence due to some perceived misunderstandings between the ownership of this site and ongoing difficulties regarding some of Inland Cellular LLC holdings in the area. All other items for the attached NEPA report did not reveal significant effects or impacts to the environment under the FCC regulations, 47 CFR 1.1307-1.1319. Preliminary FCC TOWAIR Analysis determination results obtained from the FCC website indicated that the tower may not require registration, although overlying Section 106 considerations may make registration of the tower a prudent action. It is your firm's obligation to attain an FAA Determination Letter for the tower even though it appears to be more than 5 miles from an airport.

An Archaeological and Cultural Resource Field Survey and Report as well as archival research did not reveal any new cultural sites on the tower site or within a 0.5-1.0 mile radius. A THPO letter with results of our findings with FCC Form 620 and the Archaeological Report was emailed the THPO on 4/21/16. Other Tribal notifications and comments have either been covered or eliminated from comments through the National Programmatic Agreement Regulations.

It is the opinion of Eagle River Development, LLC that this property should receive concurrence to allow for construction pending any delays being promulgated by the Nez Perce THPO. We caution Inland Telephone Company from initiating any construction activities on the site until concurrence from the Nez Perce THPO is received and all other County/Local permits that may be required are received. We are submitting this report and invoice prior to such concurrence at the request of Mr. Bob Hillweg.

Respectfully,


John F. Wark, RPG

Principal Environmental Geologist

Attachments: Invoice, Email of Report, 2 hard copies of nepa checklist summary report & disc w/nepa report.

LINE 1010 - VOICE SERVICE RATE COMPARABILITY COMPLIANCE

(472423 ID VOICE SERVICES COMPARABILITY CERTIFICATION LN 1010.pdf)

**Voice Services Rate Comparability Certification
§54.313(a)(2)**

Any recipient of high-cost support shall provide the following: A certification that the pricing of the company's voice services is not more than two standard deviations above the applicable national average urban rate for voice service, which will be specified annually in a public notice issued by the FCC's Wireline Competition Bureau.

PUBLIC NOTICE DA 19-1237 – Voice Rates. Based on the survey results, the 2020 urban average monthly rate (the rate floor) is \$34.81. Therefore, the reasonable comparability benchmark for voice services, two standard deviations above the urban average, is \$54.76. Under the Commission's rules, each ETC, including competitive ETCs providing fixed voice services, must certify in the FCC Form 481 filed no later than July 1, 2020 that the pricing of its basic residential voice services is no more than \$54.76.

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.

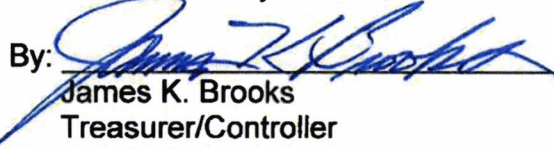
On this basis, the Company certifies, pursuant to 47 C.F.R. § 54.313(a)(10), that the Company's pricing of its voice services is no more than \$54.76.

The Company further submits, as support, the following residential service lines and rates; excluding the Federal Subscriber Line Charge of \$6.50 and below \$34.81:

Exchange	Rate Type	Count	Base Res. Rate	State SLC	State USF Fee	Mand. EAS Charge	Total Per Res.
LENORE (836)	Residential	155	25.76	0	.25	0	26.01
LENORE (836)	Res-Measured	8	18.00	0	.25	0	18.25
LEON (224)	Residential	22	25.76	0	.25	0	26.01
LEON (224)	Res-Measured	2	18.00	0	.25	0	18.25

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

Dated this 22nd day of June, 2020 in Roslyn, Washington.

By: 
James K. Brooks
Treasurer/Controller
Inland Telephone Company

LINE 1030 - BROADBAND COMPARABILITY COMPLIANCE

(472423 ID BROADBAND RATE COMPARABILITY CERTIFICATION LN 1030.pdf)

Broadband Services Rate Comparability Certification
§54.313(a)(3)

Any recipient of high-cost support shall provide the following: A certification that the pricing of one of their broadband services, which meet public interest obligations, is no more than the applicable benchmark announced annually in a public notice issued by the FCC's Wireline Competition Bureau or is no more than the non-promotional price charged for a comparable fixed wireline service in urban areas in the states or U.S. Territories where the eligible telecommunications carrier receives support.

PUBLIC NOTICE DA 19-1237 – Broadband Rates. Recipients of high-cost and/or Connect America Fund support that are subject to broadband performance obligations are required to offer broadband service at rates that are at or below the relevant reasonable comparability benchmark. Carriers subject to the Alaska Plan are required to meet Alaska-specific benchmarks and to certify that they are meeting the relevant reasonable comparability benchmark for their broadband service offering in the FCC Form 481 filed no later than July 1, 2020.

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.

The Company offers at least one broadband service plan that meets the relevant metrics in both of its Idaho exchanges; pricing benchmark for the minimum speed standard of 10 Mbps downstream, 1 Mbps upstream, and Unlimited Capacity Allowance. The Company's rate for a 10 Mbps downstream and 1 Mbps upstream service is \$65.00; the benchmark is \$83.13. In its Lenore exchange, the Company offers and advertises a fixed wireless broadband alternative; maximum offered is 25 Mbps downstream, 25 Mbps upstream, and unlimited capacity for \$75.00. On this basis, the Company certifies that the pricing of a service that meets the Commission's broadband public interest obligations is no more than the applicable benchmark announced in Public Notice DA 19-1237; compliant pursuant to 47 C.F.R. § 54.313(a)(3).

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

Dated this 22nd day of June, 2020 in Roslyn, Washington.

By: 
James K. Brooks
Treasurer/Controller
Inland Telephone Company

**LINE 1210 - TERMS & CONDITIONS OF VOICE TELEPHONY LIFELINE
PLANS**

(472423 ID LIFELINE ASSISTANCE LN 1210.pdf)

Lifeline Support – Lifeline Plans Terms and Conditions
§54.422(a)(2)

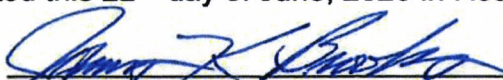
ETCs must provide information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers.

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 provide the following statement on behalf of the Company, and that the facts set forth in this statement are true to the best of my knowledge, information and belief.

On this basis, pursuant to 47 C.F.R. § 54.422(a)(2), the Company states that it provides service in a non-discriminatory manner and does not unlawfully discriminate on the basis of race, sex, age, religion, national origin, gender identity, sexual orientation, marital status, veteran status or any other basis prohibited by federal, state or local law. With that said, the Company offers its voice telephony services similarly to all that subscribe; there are no specific "Lifeline Plans" and no special terms or conditions for those utilizing Lifeline assistance. The Company's service application as well as its website point out the Lifeline telephone assistance program for those subscribers that may be economically challenged. The Company utilizes the National Verifier as well as FCC Forms 5629, 5630, and 5631 for Lifeline Applications, Household Worksheet and Re-Certification.

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

Dated this 22nd day of June, 2020 in Roslyn, Washington.

By: 
James K. Brooks
Treasurer/Controller
Inland Telephone Company

**LINE 3010B - CERTIFICATE OF PUBLIC INTEREST {47 CFR §
54.313(f)(1)(i)}**

(472423 ID CERTIFICATE OF PUBLIC INTEREST OBLIGATIONS LN 3010B.pdf)

Public Interest Obligations - Broadband Certification
§54.313(f)(1)(i)

Rate-of-Return ETCs are required to provide certain certifications and other details related to their broadband obligations.


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.

The Company currently offers and advertises a maximum speed of 20 Mbps downstream/1 Mbps upstream in its Leon exchange with planned upgrades as the Company expands its fiber footprint. The Company currently offers and advertises a maximum speed of 25 Mbps downstream/25 Mbps upstream in its Lenore exchange and has consciously limited its offering based on bandwidth to the Internet from this exchange location. The Company is working toward full exchange availability. The Company currently conditions both of these offerings as they are not available throughout these exchanges.

On this basis, the Company certifies, pursuant to 47 C.F.R. § 54.313(f)(1)(i), that it has taken reasonable steps to provide upon reasonable request, broadband service at actual speeds of 10 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas, and that requests for such service are met within a reasonable amount of time.

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

Dated this 22nd day of June, 2020 in Roslyn, Washington.

By: 
James K. Brooks
Treasurer/Controller
Inland Telephone Company

**LINE 3017 - RUS ANNUAL REPORT AND ALL REQUIRED
DOCUMENTATION**

(472423 ID RUS ANNUAL REPORT LN 3017.pdf)

USDA-RUS OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS	<i>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.</i>	
	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 2019	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 _____ 3/25/2020
 DATE

PART A. BALANCE SHEET

ASSETS	BALANCE PRIOR YEAR	BALANCE END OF PERIOD	LIABILITIES AND STOCKHOLDERS' EQUITY	BALANCE PRIOR YEAR	BALANCE END OF PERIOD
CURRENT ASSETS			CURRENT LIABILITIES		
1. Cash and Equivalents	809,634	606,755	25. Accounts Payable	172,199	154,378
2. Cash-RUS Construction Fund	809,556	324,233	26. Notes Payable	0	0
3. Affiliates:			27. Advance Billings and Payments	0	0
a. Telecom, Accounts Receivable	0	0	28. Customer Deposits	2,504	2,198
b. Other Accounts Receivable	0	0	29. Current Mat. L/T Debt	1,104,721	1,123,525
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	563,898	760,642	32. Income Taxes Accrued	0	0
b. Other Accounts Receivable	0	0	33. Other Taxes Accrued	80,191	66,468
c. Notes Receivable	56,449	45,434	34. Other Current Liabilities	599,154	604,815
5. Interest and Dividends Receivable	0	0	35. Total Current Liabilities (25 thru 34)	1,958,769	1,951,384
6. Material-Regulated	266,912	282,212	LONG-TERM DEBT		
7. Material-Nonregulated	0	0	36. Funded Debt-RUS Notes	9,769	0
8. Prepayments	128,855	121,457	37. Funded Debt-RTB Notes	0	0
9. Other Current Assets	40	40	38. Funded Debt-FFB Notes	12,217,654	11,103,868
10. Total Current Assets (1 Thru 9)	2,635,344	2,140,773	39. Funded Debt-Other	(4,103)	(4,312)
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	2,020,864	2,193,097	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	269,802	288,448	46. Total Long-Term Debt (36 thru 45)	12,223,320	11,099,556
13. Nonregulated Investments	1,593,896	1,775,831	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	1,970,370	1,988,342
16. Jurisdictional Differences	0	0	49. Other Jurisdictional Differences	0	0
17. Total Noncurrent Assets (11 thru 16)	3,884,812	4,257,626	50. Total Other Liabilities and Deferred Credits (47 thru 49)	1,970,370	1,988,342
PLANT, PROPERTY, AND EQUIPMENT			EQUITY		
18. Telecom, Plant-in-Service	34,816,371	34,950,329	51. Cap. Stock Outstand. & Subscribed	93,150	93,150
19. Property Held for Future Use	590,472	590,472	52. Additional Paid-in-Capital	7,175	7,175
20. Plant Under Construction	162,313	726,286	53. Treasury Stock	0	0
21. Plant Adj., Nonop. Plant & Goodwill	0	0	54. Membership and Cap. Certificates	0	0
22. Less Accumulated Depreciation	17,853,767	19,014,618	55. Other Capital	0	0
23. Net Plant (18 thru 21 less 22)	17,715,389	17,252,469	56. Patronage Capital Credits	0	0
24. TOTAL ASSETS (10+17+23)			57. Retained Earnings or Margins	7,982,761	8,511,261
	24,235,545	23,650,868	58. Total Equity (51 thru 57)	8,083,086	8,611,586
			59. TOTAL LIABILITIES AND EQUITY (35+46+50+58)	24,235,545	23,650,868

USDA-RUS

**OPERATING REPORT FOR
TELECOMMUNICATIONS BORROWERS**

BORROWER DESIGNATION

WA0534

PERIOD ENDING

December 2019

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	703,462	660,195
2. Network Access Services Revenues	5,094,753	5,364,072
3. Long Distance Network Services Revenues	3	8
4. Carrier Billing and Collection Revenues	37,711	26,978
5. Miscellaneous Revenues	79,273	74,013
6. Uncollectible Revenues	6,341	34,677
7. Net Operating Revenues (1 thru 5 less 6)	5,908,861	6,090,589
8. Plant Specific Operations Expense	1,779,446	1,783,367
9. Plant Nonspecific Operations Expense (Excluding Depreciation & Amortization)	490,124	512,504
10. Depreciation Expense	1,457,637	1,466,922
11. Amortization Expense	172	136
12. Customer Operations Expense	612,431	652,288
13. Corporate Operations Expense	949,303	883,196
14. Total Operating Expenses (8 thru 13)	5,289,113	5,298,413
15. Operating Income or Margins (7 less 14)	619,748	792,176
16. Other Operating Income and Expenses	0	0
17. State and Local Taxes	263,685	271,416
18. Federal Income Taxes	170,169	173,022
19. Other Taxes	0	0
20. Total Operating Taxes (17+18+19)	433,854	444,438
21. Net Operating Income or Margins (15+16-20)	185,894	347,738
22. Interest on Funded Debt	300,454	278,272
23. Interest Expense - Capital Leases	0	0
24. Other Interest Expense	39	944
25. Allowance for Funds Used During Construction	10,892	6,901
26. Total Fixed Charges (22+23+24-25)	289,601	272,315
27. Nonoperating Net Income	176,340	(28,832)
28. Extraordinary Items	0	0
29. Jurisdictional Differences	0	0
30. Nonregulated Net Income	520,112	481,909
31. Total Net Income or Margins (21+27+28+29+30-26)	592,745	528,500
32. Total Taxes Based on Income	0	0
33. Retained Earnings or Margins Beginning-of-Year	7,387,781	7,982,761
34. Miscellaneous Credits Year-to-Date	2,235	0
35. Dividends Declared (Common)	0	0
36. Dividends Declared (Preferred)	0	0
37. Other Debits Year-to-Date	0	0
38. Transfers to Patronage Capital	0	0
39. Retained Earnings or Margins End-of-Period [(31+33+34) - (35+36+37+38)]	7,982,761	8,511,261
40. Patronage Capital Beginning-of-Year	0	0
41. Transfers to Patronage Capital	0	0
42. Patronage Capital Credits Retired	0	0
43. Patronage Capital End-of-Year (40+41-42)	0	0
44. Annual Debt Service Payments	1,400,521	1,383,232
45. Cash Ratio [(14+20-10-11) / 7]	0.7218	0.7020
46. Operating Accrual Ratio [(14+20+26) / 7]	1.0176	0.9876
47. TIER [(31+26) / 26]	3.0468	2.9408
48. DSCR [(31+26+10+11) / 44]	1.6709	1.6395

USDA-RUS

**OPERATING REPORT FOR
TELECOMMUNICATIONS BORROWERS**

INSTRUCTIONS - See RUS Bulletin 1744-2

BORROWER DESIGNATION

WA0534

PERIOD ENDED

December 2019

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)
ROSLYN	24.00	18.00	191	1,030	1,221	224.19	100.57
UNIONTOWN	25.00	18.00	71	235	306	309.21	64.25
LENORE	40.68	25.76	6	172	188	178.34	12.00
ROUTE MILES OUTSIDE EXCHANGE AREA						7.67	7.67
LEON	40.68	25.76	1	23	24	20.37	13.14
DEWATTO	27.00	22.00	13	273	286	157.60	53.42
PRESCOTT	26.50	18.00	36	81	117	208.09	53.15
MobileWireless					0		
Route Mileage Outside Exchange Area						0.00	0.00
Total			318	1,814	2,142	1,105.47	304.20
No. Exchanges	7						

USDA-RUS

**OPERATING REPORT FOR
TELECOMMUNICATIONS BORROWERS**

INSTRUCTIONS - See RUS Bulletin 1744-2

BORROWER DESIGNATION

WA0534

PERIOD ENDED

December 2019

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

4. BROADBAND SERVICE

EXCHANGE	No. Access Lines with BB available (a)	No Of Broadband Subscribers (b)	Details on Least Expensive Broadband Service					
			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)
ROSLYN	1,221	1,442	32	6,000	1,500	49.95	Package	DSL
UNIONTOWN	306	224	132	6,000	1,500	49.95	Package	DSL
LENORE	188	86	32	768	512	39.95	Package	DSL
ROUTE MILES OUTSIDE EXCHANGE AREA								
LEON	24	21	14	6,000	1,500	49.95	Package	DSL
DEWATTO	286	240	25	768	512	39.96	Package	DSL
PRESCOTT	117	56	6	768	512	39.95	Package	DSL
Total	2,142	2,069						

USDA-RUS OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS	BORROWER DESIGNATION WA0534 PERIOD ENDING December 2019
INSTRUCTIONS- See RUS Bulletin 1744-2	

PART D. SYSTEM DATA				
1. No. Plant Employees	2. No. Other Employees	3. Square Miles Served	4. Access Lines per Square Mile	5. Subscribers per Route Mile
18	22	463	4.63	1.94

PART E. TOLL DATA	
1. Study Area ID Code(s) a. _____ b. _____ 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	
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)	1,307,331
6. Salvaged Materials	
7. Contribution in Aid to Construction	
8. Gross Additions to Telecom. Plant (1 thru 7)	1,307,331

PART G. INVESTMENTS IN AFFILIATED COMPANIES					
INVESTMENTS (a)	CURRENT YEAR DATA		CUMULATIVE DATA		
	Investment This Year	Income/Loss This Year	Cumulative Investment To Date	Cumulative Income/Loss To Date	Current Balance
	(b)	(c)	(d)	(e)	(f)
1. Investment in Affiliated Companies - Rural Development	172,233		2,193,097		2,193,097
2. Investment in Affiliated Companies - Nonrural Development					

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

BORROWER DESIGNATION

WA0534

PERIOD ENDING

December 2019

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	

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PART I – STATEMENT OF CASH FLOWS			
1. Beginning Cash (Cash and Equivalents plus RUS Construction Fund)		1,619,190	
CASH FLOWS FROM OPERATING ACTIVITIES			
2. Net Income		528,500	
<i>Adjustments to Reconcile Net Income to Net Cash Provided by Operating Activities</i>			
3. Add: Depreciation		1,466,922	
4. Add: Amortization		136	
5. Other (Explain) See Note Section		275,667	
<i>Changes in Operating Assets and Liabilities</i>			
6. Decrease/(Increase) in Accounts Receivable		(196,744)	
7. Decrease/(Increase) in Materials and Inventory		(15,300)	
8. Decrease/(Increase) in Prepayments and Deferred Charges		7,398	
9. Decrease/(Increase) in Other Current Assets		0	
10. Increase/(Decrease) in Accounts Payable		(17,821)	
11. Increase/(Decrease) in Advance Billings & Payments		0	
12. Increase/(Decrease) in Other Current Liabilities		(8,062)	
13. Net Cash Provided/(Used) by Operations		2,040,696	
CASH FLOWS FROM FINANCING ACTIVITIES			
14. Decrease/(Increase) in Notes Receivable		11,015	
15. Increase/(Decrease) in Notes Payable		0	
16. Increase/(Decrease) in Customer Deposits		(306)	
17. Net Increase/(Decrease) in Long Term Debt (Including Current Maturities)		(1,104,960)	
18. Increase/(Decrease) in Other Liabilities & Deferred Credits		17,972	
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) See Note Section		(28,681)	
23. Net Cash Provided/(Used) by Financing Activities		(1,104,960)	
CASH FLOWS FROM INVESTING ACTIVITIES			
24. Net Capital Expenditures (Property, Plant & Equipment)		(697,931)	
25. Other Long-Term Investments		(372,814)	
26. Other Noncurrent Assets & Jurisdictional Differences		0	
27. Other (Explain) See Note Section		(553,193)	
28. Net Cash Provided/(Used) by Investing Activities		(1,623,938)	
29. Net Increase/(Decrease) in Cash		(688,202)	
30. Ending Cash		930,988	

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<p style="text-align: center;">USDA-RUS</p> <p style="text-align: center;">OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS</p>	<p style="text-align: center;">BORROWER DESIGNATION</p> <p style="text-align: center;">WA0534</p>
<p>INSTRUCTIONS - See RUS Bulletin 1744-2</p>	<p>PERIOD ENDED</p> <p style="text-align: center;">December 2019</p>
<p>NOTES TO THE OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS</p>	
<p>Part E. 1. Study Area ID Codes Table no available a. 472423b. 522423Part 1 - Statement of Cash Flows 5. Depreciation & amortization on nonregulated investments \$139,723 Change in deposits (\$306) Cash surrender value of life insurance (\$8,216)Less plant in AP difference \$3,209Notes Receivable \$11,015Deferred FIT \$173,022Gain on disposal (\$32,350)Unrealized gain on investment (\$4,224)Non-cash stock dividend (\$6,206)Total Amount of Adjustment- Operations \$275,66722.Notes Receivable (\$11,015)Non-cash transfer of deferred FIT \$155,050Change in deposits \$306Operating Deferred FIT (\$173,022)Total Amount of Adjustment - Financing (\$28,681)27.Retirements/Transfers in Net Plant (\$306,207)Proceeds from sale of equipment \$32,350Cash surrender value of life insurance \$8,216Non-cash stock dividend \$6,206Unrealized gain on investment \$4,224Plant in AP (3,209)Non-cash transfer of deferred FIT (\$155,050)Operating Depreciation on long term investments (\$139,723)Total Amount of Adjustment-Investing (\$553,193)</p>	

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