

TOWNES TELECOMMUNICATIONS SERVICES CORPORATION

June 6, 2012

Ms. Ann Cole, Commission Clerk
Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: FPSC Docket No. 120150-TL
Northeast Florida Telephone Company
State Certification of Rural Telecommunications Carriers Pursuant to
47 C.F.R. §54.314

Dear Ms. Cole:

Enclosed herewith for filing in the above referenced docket, is the signed affidavit of Northeast Florida Telephone Company, Inc. d/b/a/ NEFCOM ("NEFCOM") certifying that all federal high-cost support received by NEFCOM in 2013 will only be used for the provision, maintenance and upgrading of facilities and services for which such support is intended. In addition, NEFCOM has certified to the new ETC reporting requirements established by Order No. PSC-05-0824-FOF-TL, issued August 15, 2005 in the above referenced docket.

Please contact me at (904) 688-0029 should you have any questions regarding this filing.

Sincerely,

Deborah Nobles
Vice President of Regulatory Affairs

Enclosure

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AFFIDAVIT

STATE OF FLORIDA
COUNTY OF CLAY

BEFORE ME, the undersigned authority, appeared Deborah Nobles who deposed and said:

1. My name is Deborah Nobles. I am employed by Northeast Florida Telephone Company, Inc. d/b/a NEFCOM ("NEFCOM" or the "Company") as its Vice President of Regulatory Affairs. I am an officer of the Company and am authorized to give this affidavit on behalf of the Company. This affidavit is being given to support the Florida Public Service Commission's certification as contemplated in 47 C.F.R. §54.314.

2. NEFCOM hereby certifies that it will only use the federal high-cost support it receives during 2013 for the provision, maintenance and upgrading of facilities and service for which such support is intended.

3. NEFCOM hereby certifies that it has submitted via annual NECA filings, the supporting documentation on network improvements and expenditures in support of our universal service filing and refers to this in lieu of formal network plans. The basis for the federal high-cost support the Company will receive in 2013 is the actual costs incurred during 2011. Therefore, the 2013 federal high-cost support is reimbursing the Company for investments and expenses already incurred.

The federal high-cost program is administered through the Universal Service Administrative Company (USAC). USAC, as a private, not-for-profit corporation, is responsible for providing every state and territory of the United States with access to affordable telecommunications service through the federal USF. USAC has contracted with NECA to assist in data collection necessary for the remittance of universal service funds. What this means is that each company submits, no less frequently than annually, detailed information requested by NECA in the USF data collection process.

Rural ILECs must attest to the information submitted. Further, NECA and its auditors must attest to the validity and integrity of NECA's process. In other words, the Incumbent Local Exchange Carriers (ILECs) cost studies and responses to data collection requests are subject to audit. The information provided in response to all of the universal service fund mechanisms utilizes FCC accounts for regulated costs and must be in compliance with FCC rules in Parts 32, 36, 54 and 64.

Cost studies and all USF funding submitted by NEFCOM are based upon audited financial statements. In addition, NECA performs focus reviews of cost studies as well as the USF filings

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for the cost companies involved in the NECA process. In addition, an officer of the Company must certify the accuracy and validity of the filed information.

NEFCOM does not provide services outside of the regulated study area (service area) that is used in the calculation of federal high cost support. The Company's network provides the services supported by federal USF throughout its entire service area and the existing network requires extensive annual investments and expenditures to replace or upgrade facilities and equipment in order to maintain a high level of quality of service for the supported services. Therefore, NEFCOM certifies that the federal high-cost funds received in 2013 has and will continue to be used solely for the purpose for which it is intended.

4. NEFCOM hereby certifies that it follows appropriate procedures for network outage reporting as per the Federal Outage Reporting Order and State Outage Reporting Requirements. For the period between March 1, 2011 and March 1, 2012, NEFCOM did not have any Federal FCC reportable outages and had one State PSC reportable outage.

The service outage was first reported to the FPSC at 11:51 AM on April 7, 2011. The outage began at 10:30 AM on April 7, 2011 and service was restored by 12:30 AM that same day. A full report of the outage was provided to Clayton Lewis with the FPSC on April 8, 2012 via telephone and via email.

5. NEFCOM hereby certifies that it did fulfill all requests for service from potential customers.

6. NEFCOM hereby certifies that for the period from March 1, 2011 and March 1, 2012, zero service complaints were received.

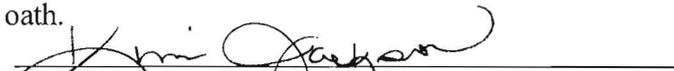
7. NEFCOM hereby certifies that it complies with applicable state quality of service standards, federal and state consumer protection rules, is able to function in emergency situations, offers a tariffed local usage plan and provides equal access to long distance carriers.

FURTHER AFFIANT SAYETH NOT.


Deborah Nobles
Vice President of Regulatory Affairs

STATE OF FLORIDA
COUNTY OF CLAY

Acknowledged before me this 6th day of June 2012, by Deborah Nobles, as Vice President of Regulatory Affairs of Northeast Florida Telephone Company, Inc. d/b/a NEFCOM, who is personally known to me and who did take an oath.


Kim Jackson – Notary Public

