

**Eric Fryson**

---

**From:** McCabe, Thomas M. [thomas.mccabe@tdstelecom.com]  
**Sent:** Tuesday, June 26, 2012 2:59 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** Jim Polk; Gaudreau, Amber; McCabe, Thomas M.  
**Subject:** RE: E-filing (Docket No. 120150-TL - 2013 State certification of rural telecommunications carriers)  
**Attachments:** FL ETC Ammendment.pdf

Electronic Filing

a. Person responsible for this electronic filing:

Thomas M. McCabe, External Affairs Manager

TDS Telecom/Quincy Telephone

107 W. Franklin St.

Quincy, FL 32351

(850) 875-5207

[thomas.mccabe@tdstelecom.com](mailto:thomas.mccabe@tdstelecom.com)

b. Docket No. 120150-TL

In re: 2013 State certification of rural telecommunications carriers.

c. Document being filed on behalf of TDS Telecom/Quincy

d. There are a total of 4 pages.

e. The document attached for electronic filing is TDS Telecom/Quincy's annual ETC Recertification as required by Federal Communications Commission (FCC) rule 47 C.F.R. §54.314.

(See attached file: FL ETC Recertification.pdf)

Thank you for your attention and cooperation to this request.

Tom McCabe  
Manager - State Government Affairs  
FL, GA, and VA  
TDS Telecom  
1400 Village Square Blvd  
Suite #3 - box 329  
Tallahassee, FL 32312-1231  
[Thomas.mccabe@tdstelecom.com](mailto:Thomas.mccabe@tdstelecom.com)  
850-893-5037  
850-570-9773 (cell)  
850-875-5225 (fax)

RECEIVED BY MAIL ROOM DATE

04240 JUN 26 2012

FPSC-COMMISSION CLERK

6/26/2012



525 Junction Rd  
Madison, WI 53717  
www.tdstelecom.com

June 25, 2012

**FILED ELECTRONICALLY**

Ann Cole- Commission Clerk  
Division of Communications Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Re: Docket No. 120150-TL; Quincy Telephone Company d/b/a TDS Telecom

Dear Ms. Cole;

This letter is to request that the Florida Public Service Commission notify the Universal Service Administrative Company (USAC) and the Federal Communications Commission (FCC) that Quincy Telephone Company d/b/a TDS Telecom/Quincy Telephone ("Quincy") is eligible to receive federal high-cost support in accordance with the above-referenced statute and federal rule.

The amount of federal high-cost support that Quincy will receive in 2013 will continue to be used for the services and functionalities outlined in 47 C.F.R. §54.101(a) and as the attached affidavit shows Quincy certifies that it will only use the federal high-cost support it receives for the provision, maintenance and upgrading of facilities and service for which such support is intended.

This state certification for federal support is an annual process. In order to receive federal support beginning January 1 of each year, the Florida Public Service Commission must file its annual certification on or before October 1 of the year before.

Please note, the affidavit was amend to comply with paragraph 609 of the connect America order.

Quincy respectfully requests that the Commission notify the FCC prior to October 1 of this year that Quincy is eligible to receive federal high-cost support for 2013. If there any questions, please contact Tom McCabe at 850-875-5207.

Regards,

A handwritten signature in black ink that reads "Amber Gaudreau".

Amber Gaudreau  
Senior Administrator, Regulatory Compliance

DOCUMENT NUMBER DATE

04240 JUN 26 2012

FPSC-COMMISSION CLERK

**AFFIDAVIT**

BEFORE ME, the undersigned authority appeared Kevin G. Hess who deposed and said:

My name is Kevin G. Hess. I am employed by TDS Telecommunications Corporation, the parent company of Quincy Telephone Company d/b/a TDS Telecom/Quincy ("TDS" or the "Company") as its Senior Vice President, Government & 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.

TDS hereby certifies that all federal high-cost support was used in the preceding calendar year and will be used in the new calendar year only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.

1. TDS 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. USF disbursement received by the Company and other rural incumbent local exchange companies is divided into four categories: Interstate Common Line Support ("ICLS"), Local Switching Support ("LSS"); High Cost Loop Support ("HCLS"); and Safety Net Additive Support ("SNAS"). Each of these mechanisms has been created by the FCC in conjunction with the Federal-State Joint Board on Universal Service. This means that representatives from State Commissions have also been involved in the development of these mechanisms through their representation in the Joint Board process.

ICLS is a universal service mechanism which is based upon each companies embedded, interstate loop costs and allows rate-of-return companies to offset interstate common line access charges and recover its interstate common line revenue requirement and still allow SLCs to remain affordable to customers. ICLS is reimbursing ILECs for investments and expenses already incurred. The ICLS calculation uses the interstate cost structure of a rural incumbent local exchange carrier ("ILEC") based upon annual interstate cost studies that are submitted and certified by the companies and received by NECA. The difference between the interstate common line revenue requirement, again as set forth in the company's annual interstate cost study and the SLC revenue collected from end users, makes up the ICLS.

LSS rules established by the FCC use the embedded costs of the rural ILECs associated with switching investments, depreciation, maintenance, expenses, taxes and an FCC established rate of return. Therefore, LSS is reimbursing ILECs for investments and expenses already incurred. This amount is used to offset the rural ILECs' interstate switching revenue requirement. The difference between the interstate switching revenue requirement, again as set forth in the company's annual interstate cost study and LSS, makes up the switching rate which is charged to interexchange carriers.

11:14 AM EDT JUN 26 2012

04240 JUN 26 02

FPSC-COMMISSION CLERK

The HCLS for rural ILECs is based upon each company's embedded, unseparated loop costs. These costs are calculated using a set of complex algorithms approved by the FCC, the inputs for which are scrutinized by NECA. Therefore, HCLS is reimbursing ILECs for investments and expenses already incurred.

Pursuant to the FCC Order, SNAS is support above the HCL cap for carriers that make significant investment in rural infrastructure in years in which HCL is capped. To receive SNAS, a rural carrier must show that growth in telecommunications plant in service (TPIS) per line is at least 14 percent greater than the study area's TPIS in the prior year. Therefore, SNAS is reimbursing ILECs for investments and expenses already incurred. Carriers seeking to qualify for safety net additive support must provide written notice to USAC that a study area meets the 14 percent TPIS trigger.

All of these programs are administered through the 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 ILEC 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.

All cost studies submitted by rural ILECs and all USF funding submitted by rural ILECs must be based upon financial statements. In addition, NECA performs focus reviews of cost studies as well as the USF filings for the cost companies involved in the NECA process. In addition, an officer of the rural ILEC must certify the accuracy and validity of the filed information.

HCLS data used in the HCLS calculations by NECA must also be filed with the FCC in October of each year. This data contains the regulated financial inputs into the algorithm as well as the number of loops that will receive universal service support.


2. TDS 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, TDS had no Federal FCC reportable outage and no State PSC reportable outages.

3. TDS hereby certifies that it did fulfill all requests for service from potential customers.

4. TDS hereby certifies that for the period from March 1, 2011 and March 1, 2012 one FCC complaint was received and no state PSC complaints were received.


- 5. TDS hereby certifies that it made all reasonable efforts to comply with applicable service quality standards and consumer protection rules, in accordance with Florida Statutes and the Florida Administrative Code.
- 6. TDS hereby certifies that it is able to function in emergency situations.
- 7. TDS already provides equal access to long distance carriers.

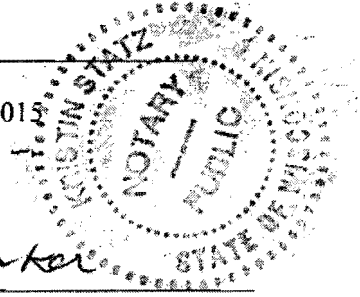
FURTHER AFFIANT SAYETH NOT.

  
\_\_\_\_\_  
Kevin G. Hess  
Senior Vice President  
Government & Regulatory Affairs

STATE OF WISCONSIN  
COUNTY OF DANE

Acknowledged before me this 25th day of June, 2012, by Kevin G. Hess, as Senior Vice President, Government & Regulatory Affairs of TDS Telecommunications Corporation d/b/a TDS TELECOM/Quincy Telephone, who is personally known to me or produced identification and who did take an oath.

  
\_\_\_\_\_  
Kristin M. Statz – Notary Public  
My Commission expires: May 24, 2015



Personally Known Co worker  
Produced Identification Yes  
Type of Identification Produced Driver License