

## Eric Fryson

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**From:** Debi Nobles [dnobles@townes.net]  
**Sent:** Wednesday, June 27, 2012 4:36 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** 'Debi Nobles'; Jim Polk  
**Subject:** RE: E-Filing Amended Affidavit Docket No. 120150-TL - 2013 State certification of rural telecommunications carriers

**Attachments:** Docket No. 120150-TL NEFCOM.PDF



Docket No.  
50-TL NEFCOM.

Electronic Filing

a. Person responsible for this electronic filing:

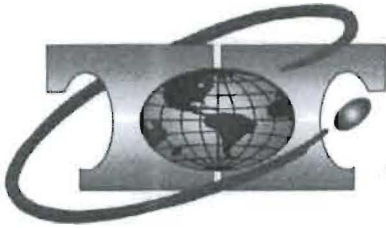
Deborah Nobles  
Vice President of Regulatory Affairs  
Townes Telecommunications Services Corporation  
505 Plaza Circle, Suite 200  
Orange Park, FL 32073  
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b. Docket No. 120150-TL  
In re: 2013 State certification of rural telecommunications carriers

c. Filed on behalf of Northeast Florida Telephone Company (NEFCOM)

d. Total Pages - 3

e. NEFCOM's amended Annual ETC Certification as required by FCC rule 47  
C.F.R. 54.314



**TOWNES TELECOMMUNICATIONS SERVICES CORPORATION**

July 27, 2012

**FILED ELECTRONICALLY**

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 an amended 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.

The affidavit was amended to also certify that the company used the federal high cost support received in the preceding calendar year for the provision, maintenance and upgrading of facilities and services for which such support is intended in compliance with Paragraph 609 of FCC Order 11-161.

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

Sincerely,

Deborah Nobles  
Vice President of Regulatory Affairs

Enclosure

DOCUMENT NUMBER DATE

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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 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 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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FPSC-COMMISSION CLERK

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 had one (1) service outage that was reported to both the FCC and to the state PSC.


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.

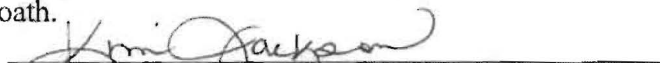
7. NEFCOM hereby certifies that it complies with applicable state quality of service standards, federal and state consumer protection rules, is able to function in emergency situations, offers a tariffed local usage plan and provides equal access to long distance carriers.

FURTHER AFFIANT SAYETH NOT.

  
Deborah Nobles  
Vice President of Regulatory Affairs

STATE OF FLORIDA  
COUNTY OF CLAY

Acknowledged before me this 27th day of July 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

