



In addition, to the extent changes have occurred to date with respect to the Company's planned 2014 investments noted in last year's two-year plan, the changes are referenced in that Confidential Exhibit. Estimates of the expenditures to be made by the Company for calendar year 2015 through 2019, related to the provision, maintenance, and upgrading of facilities and services supported by federal universal service, are provided on Confidential Exhibit B hereto as part of the Company's current Five-Year service quality improvement plan associated with the FCC's requirement in section 47 C.F.R. §54.202(a)(1)(ii). Consistent with federal universal service principles, the Company will use federal universal service amounts received in 2015 to offset a portion of these 2015 expenditures. This use of federal universal service support will enable the Company to: (1) maintain rates for its local exchange services that are affordable and reasonably comparable to rates being charged for the same services in urban areas; and (2) to upgrade its telecommunications facilities and equipment as necessary to meet evolving service requirements, including those related to broadband services, and maintain high quality service. The use of federal universal service support for these purposes is clearly consistent with the federal universal service provisions.

3. In addition to the information included in Confidential Exhibits A and B, attached as Confidential Exhibit C-1 is a copy of Valley Telecommunications Cooperative Association, Inc.'s FCC Form 481 as required by 47 C.F.R. § 54.313 and 54.422. Confidential Exhibit C-1 provides the requirements associated with §§ 20:10:32:54(3), 20:10:32:54(4) and 20:10:32:54(5), on lines 220, 300-330 and 400-450 of Form 481 respectively. A redacted copy of Form 481 is attached as Exhibit C-2.

4. Exhibit D is a document containing other certifications, including those required under the provisions of ARSD §§ 20:10:32:54(6) and 20:10:32:54(7). §§ 20:10:32:54(8) and 20:10:32:54(9) were waived in their entirety as part of PUC docket TC13-027.

5. Based on all of the foregoing information, including the information provided on Confidential Exhibits A, B, C-1 and Exhibits C-2 and D, the Company requests that this Commission issue an appropriate certification to the FCC and USAC indicating that Valley Telecommunications Cooperative Association, Inc. is in compliance with 47 U.S.C. § 254(e) and should receive all federal universal service support determined for distribution to the Company in 2014. In order to ensure that this certification is issued to the FCC prior to October 1, 2014, the Company would further ask the Commission to expedite the process that is initiated based on this filing.

Dated this 26 day of June 2014.

Respectfully submitted,



Darla Pollman Rogers

Margo D. Northrup

Riter, Rogers, Wittier & Northrup

P.O. Box 280

Pierre, SD 57501

Attorney for the Company