

Attachments

1. Demonstration of Compliance with Applicable Service Quality Standards and Consumer Protection Rules:

In establishing this certification in its *2005 ETC Order*,¹ the FCC found that an ETC must make “a specific commitment to objective measures to protect consumers.”² The FCC found that for wireless ETCs, compliance with CTIA’s Consumer Code for Wireless Service would satisfy this requirement” and that the sufficiency of other commitments would be considered on a case-by-case basis.³ In this context, the FCC stated, “to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement.”⁴

Interstate Telecommunications Cooperative, Inc. (“Company”) hereby certifies that it is complying with applicable service quality standards and consumer protection rules. The Company is subject to consumer protection obligations under both federal and South Dakota state law. These obligations include, but are not limited to, the following: (1) filing a Local Exchange Tariff pursuant to the requirements of the South Dakota Administrative Rule 20:10:27:07 which discloses rates, terms and conditions of service to customers; (2) adherence to state requirements that the Company satisfies and certifies annually that it complies with consumer protection and service quality standards pursuant

¹ *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) (“*2005 ETC Order*”).

² *Id.* at para. 28.

³ *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: “(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy.” *Id.* at n. 71.

⁴ *Id.* at n. 72.

to South Dakota Administrative Rules (20:10:32:54.06), including South Dakota Administrative Rules regarding transmittal of bills (20:10:07:03), billing requirements (20:10:34:09), billing disputes (20:10:07:04), refunds for service interruptions (20:10:07:05) service quality standards for local exchange companies (20:10:33), and notification of adverse changes in rates, terms, or conditions (South Dakota Codified Law 49-31-2.8); (3) truth-in-billing requirements, and (4) CPNI, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

The Company is subject to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in F.C.C. 47 C.F.R. Part 8 §8.3. The Company complies with all requirements set forth in the *2015 Open Internet Order* as they become effective.

1. Ability to Function in Emergency Situations

Interstate Telecommunications Cooperative, Inc. [Company] hereby certifies that it is able to function in emergency situations as set forth in §54.202(a)(2)¹ and South Dakota Administrative Rule 20:10:32:54.07. The Company's voice & broadband network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow the Company to manage traffic spikes throughout its network, as emergency situations require. The Company maintains a contingency plan to prevent or minimize service interruptions due to the catastrophic loss of a central office switch, toll switching office, or tandem switching office, pursuant to South Dakota Administrative Rule 20:10:33:18. The plan is available for review upon request.

Specifically, each central office building is supplied with standby generators and battery back-up that enable the central office to keep running until power is restored so long as fuel is available, or until system changes are made to reroute traffic. As required by South Dakota Administrative Rule 20:10:33:19, the Company's central office can maintain 8 hours, plus or minus 15 percent, of battery reserve rated for peak traffic load requirements, and a permanent auxiliary power unit is installed. The Company has

¹ Section 54.202(a)(2) requires ETCs that are designated by the Commission to "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."

battery backup at all office locations and in its electronic equipment sites capable of running for a minimum of 8 hours, plus or minus 15 percent, in compliance with the State rules. Length of run time is determined by the equipment serving the area and the number of customers working out of the equipment. Generators are installed at all Central Office locations. They will continue to run as long as the Company has access to propane. The Company tests the batteries at least once per year. The Company complies with the FCC's backup power requirements, effective October 16, 2015.

REDACTED FOR PUBLIC INSPECTION

(700) Price Offerings including Voice Rate Data
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	391654
<015>	Study Area Name	INTERSTATE TELECOMM.
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Todd Morris
<035>	Contact Telephone Number - Number of person identified in data line <030>	6058742181 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	todd.morris@itctel.com

<701>	Residential Local Service Charge Effective Date	1/1/2017
<702>	Single State-wide Residential Local Service Charge	

<703>

<a1>	<a2>	<a3>	<b1>	<b2>	<b3>	<b4>	<b5>	<c>
State	Exchange (ILEC)	SAC (CETC)	Rate Type	Residential Local Service Rate	State Subscriber Line Charge	State Universal Service Fee	Mandatory Extended Area Service Charge	Total per line Rates and Fees
SD	Gary		FR	22.5	0.0	0.0	0.0	22.5
SD	Webster		FR	22.5	0.0	0.0	0.0	22.5
SD	Wentworth		FR	22.5	0.0	0.0	0.0	22.5
SD	Chester		FR	22.5	0.0	0.0	0.0	22.5
SD	Clark		FR	22.5	0.0	0.0	0.0	22.5
SD	Elkton		FR	22.5	0.0	0.0	0.0	22.5
SD	Nunda		FR	22.5	0.0	0.0	0.0	22.5
SD	Willow Lake		FR	22.5	0.0	0.0	0.0	22.5
SD	Byrant		FR	22.5	0.0	0.0	0.0	22.5
SD	White		FR	22.5	0.0	0.0	0.0	22.5
SD	Brookings		FR	22.5	0.0	0.0	0.0	22.5
SD	Florence		FR	22.5	0.0	0.0	0.0	22.5
SD	Hayti		FR	22.5	0.0	0.0	0.0	22.5
SD	Bradley		FR	22.5	0.0	0.0	0.0	22.5
SD	Lake Norden		FR	22.5	0.0	0.0	0.0	22.5
SD	Castlewood		FR	22.5	0.0	0.0	0.0	22.5
SD	Toronto		FR	22.5	0.0	0.0	0.0	22.5
SD	Goodwin		FR	22.5	0.0	0.0	0.0	22.5
SD	Sinai		FR	22.5	0.0	0.0	0.0	22.5
SD	Astoria		FR	22.5	0.0	0.0	0.0	22.5
SD	Estelline		FR	22.5	0.0	0.0	0.0	22.5

Interstate Telecommunications Cooperative
Description of Tribal Engagement
For Form 481 Line 920 thru Line 929

The Company requested a meeting with the Sisseton Wahpeton Oyate (SWO) Tribe to exchange information and discuss issues related to the deployment and provisioning of communications services on Tribal lands. The initial request was made by letter sent via certified mail to the Tribal Chairman on October 6, 2016. The Company did not receive a response from the Sisseton Wahpeton Oyate Tribe.

In accordance with provisions in the FCC's USF and ICC Transformation Order, paragraphs 636 and 637, and 47 CFR 54.313(a)(9), at the meeting with the Tribal Authority, the Company will, with tribal input, develop a needs assessment to assist with future service deployments on Tribal lands. In particular, the Company and the Tribal Authority discussions relating to needs and service deployment will be focused on community anchor institutions. The feasibility and sustainability of communications services on tribal lands will be discussed and the Company will, with assistance from the Tribal Authority, attempt to identify additional steps that can be taken to make essential communications services deployed on Tribal lands both feasible and sustainable. The Company and Tribal Authority will also discuss and explore ways in which they can coordinate or partner to ensure that services are marketed on tribal lands in a manner that will relate to the community and resonate with consumers, with the aim of increasing service adoption. At such meeting, the Company will also be prepared to discuss the relevant rights-of-way and other permitting and review processes, as well as any challenges associated with these processes. And finally, the Company will come to any such meeting prepared to discuss and engage the Tribal Authority on any relevant and applicable Tribal business and licensing requirements.

Interstate Telecommunications Cooperative, Inc. (SAC 391654)

Response to Line 3010 – Milestone Certification (47 CFR §54.313(f)(1)(i))

Interstate Telecommunications Cooperative, Inc. hereby certifies that throughout 2016, it took reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 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. If a request for broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream is unreasonable, the Company offers broadband service at the highest available speed.

REDACTED – FOR PUBLIC INSPECTION

ATTACHMENT - LINE 3017

ATTACHMENT REDACTED IN ENTIRETY