



planned investment information previously provided to this Commission, the differences are noted in Exhibit A. Finally, Exhibit A, per the provisions of ARSD §20:10:32:54(2) includes additional information detailing progress made toward meeting 2016 service quality improvement plan targets, providing an explanation regarding any network improvement targets that were not met.

3. Last year, the Company provided as part of its annual certification filing a copy of its 2016 “Form 481” filed with the FCC pursuant to 47 C.F.R. §§ 54.313 and 54.422 and the Company has also previously provided to this Commission a copy of its “five-year service quality improvement plan” as submitted to the FCC. This five-year plan provided estimates of expenditures to be made by the Company for calendar years 2015 through 2019, related to the provision, maintenance, and upgrading of facilities and services for which universal service support is intended. The five-year plan on file with the FCC is now resubmitted to this Commission as Exhibit B and the Company requests that years 2017 and 2018 of such plan be accepted as the “two-service quality improvement plan” required by ARSD §20:10:32:54(1).

4. The Company is using federal high cost universal service support amounts thus far received in 2017 to meet the objectives identified in its service quality improvement plans and will continue to do so with respect to universal service amounts received in 2018. This use of federal universal service support will enable the Company to: (A) 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 (B) 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 high cost universal service support for these purposes is clearly consistent with the federal universal service provisions.

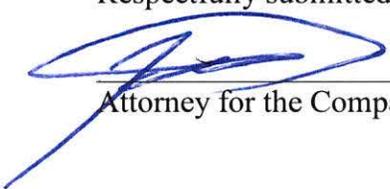
3. The attached Exhibit B also includes a copy of *Santel Communications Cooperative, Inc.*’s FCC Form 481 filing. The information in this Form, specifically as set forth on lines 220, 300-330 and 400-450, meets the state requirements established by ARSD §§ 20:10:32:54(3), 20:10:32:54(4) and 20:10:32:54(5).

4. Lastly, also attached is Exhibit C a document containing the certifications required under the provisions of ARSD §§ 20:10:32:54(6) and 20:10:32:54(7). The remaining ETC certification rule provisions found in ARSD §§ 20:10:32:54(8) and 20:10:32:54(9) have by Order been waived by this Commission.

5. Based on all the foregoing information, including all information provided within Exhibits A, B, and C (attached hereto), the Company requests that this Commission issue an appropriate certification to the FCC and USAC indicating that *Santel Communications Cooperative, Inc.* is in compliance with 47 U.S.C. § 254(e) and should receive all federal high cost universal service support determined for distribution to the Company in 2018. In order to ensure that this certification is issued to the FCC prior to October 1, 2017, the Company would further ask the Commission to expedite the process, to the extent needed to meet such deadline.

Dated this 30<sup>th</sup> day of June 2017.

Respectfully submitted,

  
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Attorney for the Company