

investments in 2015 differ from the 2015 planned investment information earlier provided to this Commission (as part of the two-year “service quality improvement plan” filed in 2014) the differences are noted in Confidential Exhibit A.

Last year, the Company provided as part of its annual certification filing a copy of its 2015 “Form 481” filed with the FCC pursuant to 47 C.F.R. §§ 54.313 and 54.422 which included the “five-year service quality improvement plan”. 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. A progress report on that five-year plan is now provided to the Commission as part of this year’s “Form 481” (line 112) filed with the FCC (attached hereto as Confidential Exhibit B-1). The Company is using federal universal service support amounts thus far received in 2016 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 2017. 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. As noted, attached as Confidential Exhibit B-1 to this Application is a copy of Valley Telecommunications Cooperative, Inc.’s FCC Form 481 filing. The information in this Confidential Exhibit, 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). A redacted copy of Form 481 is attached as Exhibit B-2.


4. Also attached is Exhibit C a document containing those 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. Attached as Confidential Exhibit D is a copy of the Company’s FCC Form 477 data as requested by the Commission in Docket TC13-027 by its “Order Clarifying Eligible Telecommunications Carrier Certification Requirements” issued May 20, 2015. Confidential Exhibit D includes a PDF copy of the completed Form 477 and two spreadsheets with the associated CSV file(s) submitted to the FCC in March 2016.

6. Based on all of the foregoing information, including all information provided within Confidential Exhibits A, B-1, and D and Exhibit B-2 and Exhibit C (attached hereto), 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 2017. In order to ensure that this certification is issued to the FCC prior to October 1, 2016, the Company would further ask the Commission to expedite the process, to the extent needed to meet such deadline.

Dated this 29 day of June 2016.

Respectfully submitted,

A handwritten signature in cursive script that reads "Margo D. Northrup". The signature is written in black ink and is positioned above a horizontal line.

Darla Pollman Rogers

Margo D. Northrup

Riter, Rogers, Wattier & Northrup, LLP

319 South Coteau Street

P.O. Box 280

Pierre, SD 57501

Phone (605) 224-7889

dprogers@riterlaw.com

Attorneys for Valley Telecommunications

Cooperative Association, Inc.