



upgrading of facilities and services for which universal service support is intended under federal law. In addition, to the extent that CRSTTA's actual capital investments in 2016 differ from the 2016 planned investment information previously provided to this Commission, the differences are noted in Confidential Exhibit A. Finally, Confidential 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, CRSTTA 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 CRSTTA 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 CRSTTA 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 Confidential Exhibit B and CRSTTA 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. CRSTTA 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 CRSTTA 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.

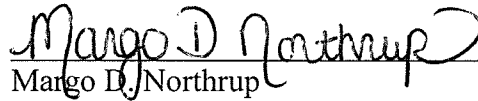
5. The attached Confidential Exhibit B-1 also includes a copy of CRSTTA's FCC Form 481 filing. The information in this Form, specifically as set forth on lines 220, 300-330 and 400-450, meets the state requirements established by ARSD §§ 20:10:32:54(3), 20:10:32:54(4) and 20:10:32:54(5). Attached Exhibit B-2 is a redacted copy of the FCC Form 481.

6. 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.

7. Based on all the foregoing information, including all information provided within Confidential Exhibit A, Confidential Exhibit B, Confidential Exhibit B-1, Confidential Exhibit B-2, and Exhibit C (attached hereto), CRSTTA requests that this Commission issue an appropriate certification to the FCC and USAC indicating that CRSTTA is in compliance with 47 U.S.C. § 254(e) and should receive all federal high cost universal service support determined for distribution to CRSTTA in 2018. In order to ensure that this certification is issued to the FCC prior to October 1, 2017, CRSTTA would further ask the Commission to expedite the process, to the extent needed to meet such deadline.

Dated this 23 day of June 2017.

Respectfully submitted,

A handwritten signature in cursive script that reads "Margo D. Northrup". The signature is written over a horizontal line.

Margo D. Northrup

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