

REDACTED – FOR PUBLIC INSPECTION

VIA ECFS

June 27, 2016

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Washington, D.C. 20554

RE: **REQUEST FOR CONFIDENTIAL TREATMENT**
WC Docket No. 14-58 - ETC Annual Reports and Certifications

Request that Information Submitted to the Commission be Withheld from Public Inspection Pursuant to 47 C.F.R. §0.459 and 5 U.S.C. §552(b)(4): Five-Year Service Quality Improvement Plan Progress Report and Service Outage Reporting included in FCC Form 481

Confidential Information – Subject to Protective Order Before the Federal Communications Commission

Dear Ms. Dortch:

In accordance with the annual reporting requirements of 47 C.F.R. §§54.313 and 54.422, Pend Orielle Telephone Company (the Company), Study Area Code 522418 is submitting a completed FCC Form 481 to the Commission via its Electronic Comment Filing System (ECFS) in WC Docket No. 14-58. *The version of the Company's FCC Form 481 submitted via ECFS is a redacted version of the filing that contains no confidential information.*

The Company, by its authorized representative, hereby requests confidential treatment of three attachments to its FCC Form 481: (1) the five-year service quality improvement plan progress report, (2) the financial annual report, and (3) service outage reporting, all of which were redacted in the ECFS submission. The request for confidential treatment of the five-year plan progress report and the service outage reporting is being made pursuant to Section 0.459 of the Commission's rules and Exemption 4 of the Freedom of

MOSS ADAMS LLP

Information Act (FOIA). The request for confidential treatment of the financial annual report is being made pursuant to the FCC's March 22, 2016 *Protective Order* in WC Docket Nos. 10-90 and 14-58. These attachments contain competitively sensitive data that Pend Orielle Telephone Company maintains as confidential and does not normally make available to the public. Release of this information would have a substantial negative impact on the Company.

Five-Year Service Quality Improvement Plan Progress Report and Service Outage Reporting

Pursuant to Section 0.459 of the Commission's rules and Exemption 4 of FOIA, Pend Orielle Telephone Company requests that the text and data extracted from its five-year service quality improvement plan progress report and the service outage reporting be withheld from public inspection because it contains competitively sensitive commercial and financial information that the Company maintains as confidential. Public availability of this information would have a substantial negative impact on the Company.

In accordance with Section 0.459 of the Commission's rules, the following information is provided in support of this request:

(1) Identification of the specific information for which confidential treatment is sought:

Attachment to Line 112 of FCC Form 481 – Five-Year Service Quality Improvement Plan Progress Report. Specifically, confidential treatment is sought for all information in the five-year plan progress report related to the Company's access line counts, existing broadband capabilities, and current and planned financial investments in its network that will improve service quality, service coverage, and/or service capacity for its customers.

Attachment to Line 200 of FCC Form 481 – Service Outage Reporting. Confidential treatment is sought for all information in the service outage report specifically related to the Company's access line counts.

(2) Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission:

The information was submitted in WC Docket No. 14-58 as an attachment to FCC Form 481- the Carrier Annual Reporting Data Collection Form. Section 100 of FCC Form 481 requires incumbent local exchange carriers receiving high cost support to attach a progress report on its five-year service quality improvement plan, pursuant to 47 C.F.R. §54.313(a)(1). Section 200 requires eligible telecommunications carriers to report outage information of at least 30 minutes in duration and impacts at least

MOSS ADAMS LLP

ten percent of the end users served in the service area or 911 special facility pursuant to 47 C.F.R. §54.313(a)(2).

- (3) Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged:

The five-year service quality improvement plan progress report contains granular information on the Company's access line counts and/or existing broadband capabilities as well as recent and planned capital investments in its network to improve service quality, service coverage, and/or service capacity. It also contains a map of the Company's service area detailing progress toward meeting broadband deployment targets at the wire center level. The service outage information contains access line information which could cause harm to the competitive position of the Company. The required information in both instances contains closely guarded, privileged information that the Company does not make publicly available.

- (4) Explanation of the degree to which the information concerns a service that is subject to competition:

Broadband service and voice service are both subject to increasing competition in the areas served by rural, rate-of-return incumbent local exchange carriers (RLECs). Virtually all RLECs face competition from one or more wireless providers that have voice and data plans. Most RLECs also face competition from at least one other wireline voice and broadband provider such as a larger cable company, who will typically seek to "cherry pick" the lower cost portions of the study area. In addition, all RLECs face competition throughout their territories from satellite providers.

- (5) Explanation of how disclosure of the information could result in substantial competitive harm:

Disclosure of the information contained in the five-year plan progress report and the outage reporting would provide competitors with detailed, granular information regarding the Company's access line count, its existing broadband capabilities, and its recent and planned network investments that improve service quality, coverage, and/or capacity for subscribers. This would give competitors invaluable confidential information with which to develop their own strategies for investing in the service area, thereby bringing substantial competitive harm to the Company.

MOSS-ADAMS_{LLP}

- (6) Identification of any measures taken by the submitting party to prevent unauthorized disclosure:

The Company has continually treated the extracted information in its five-year plan progress report and the access line counts provided in the service outage reporting as confidential and carefully controls the information to protect it from competitors. Access to the information is limited to employees that require it and to non-employees with confidentiality obligations such as lenders, consultants, auditors, and attorneys. In addition, when such information is required to be submitted to a state regulatory authority it has been filed as confidential information, not available to the public.

- (7) Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties:

The redacted information in the five-year plan progress report and service outage reporting is not available to the public, and third party access is limited as described in (6) above.

- (8) Justification of the period during which the submitting party asserts that material should not be available for public disclosure:

The Company requests that the extracted information be withheld from public inspection indefinitely. The information in the five-year plan progress report details the Company's most recent network upgrades in relation to its previously submitted service quality improvement plan. It may also contain upcoming planned network improvements during the period ending 2019. This information would provide a very useful baseline for competitors for several years beyond that period. The Company also requests that the service outage information be withheld from public inspection indefinitely because of the ongoing competitive harm it may cause.

- (9) Any other information that the party seeking confidential information treatment believes may be useful in assessing whether its request for confidentiality should be granted:

Exemption 4 of FOIA shields from public disclosure commercial or financial information obtained from a person that is privileged or confidential. Based on the responses provided above, the information in question satisfies this test.

MOSS-ADAMS_{LLP}**Financial Annual Report**

Section 3005 of FCC Form 481 requires a privately-held rate-of-return carrier receiving high cost support to attach a full and complete annual report of the company's financial condition and operations pursuant to 47 C.F.R. §54.313(f)(2). Pend Orielle Telephone Company seeks confidential treatment of its financial annual report pursuant to the March 22, 2016 *Protective Order* in WC Docket Nos. 10-90 and 14-58.¹ The *Protective Order* specifically covers information filed pursuant to 47 C.F.R. §54.313(f)(2).

Pend Orielle Telephone Company is providing to the Office of the Secretary, under seal, this cover letter and the Form 481 filing which includes the confidential information that is being requested to be withheld from public inspection.

Each page of the five-year service quality improvement plan progress report confidential submission bears the legend, "CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE."

Each page of the Service Outage Reporting (Voice) confidential submission bears the legend, "CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE."

Each page of the financial annual report confidential submission bears the legend, "CONFIDENTIAL INFORMATION – SUBJECT TO PROTECTIVE ORDER BEFORE THE FEDERAL COMMUNICATIONS COMMISSION."

The confidential information has also been submitted to the Universal Service Administrative Company through its E-File system as attachments to the FCC Form 481.

In the filing submitted via ECFS, all pages containing confidential information bear the legend "REDACTED – FOR PUBLIC INSPECTION."

This cover letter includes no confidential information and the text is the same in both the non-redacted and redacted versions except for the confidentiality markings.

¹ *Connect America Fund, ETC Annual Reports and Certifications*, WC Docket Nos. 10-90 and 14-58, Protective Order, DA 16-296 (rel. Mar. 22, 2016).

MOSS-ADAMS_{LLP}

Please contact me if you have any questions.

Sincerely,

A handwritten signature in blue ink that reads "Eric N. Votaw". The signature is written in a cursive style with a horizontal line at the end.

Eric Votaw, Senior Manager for
Moss Adams LLP

EV/ch

Enclosures

cc: Mark Martell,, Pend Oreille Telephone Company

FCC Form 481 - Carrier Annual Reporting
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

REDACTED FOR PUBLIC INSPECTION

<010> Study Area Code	522418
<015> Study Area Name	PEND OREILLE TEL.
<020> Program Year	2017
<030> Contact Name: Person USAC should contact with questions about this data	Susan case
<035> Contact Telephone Number: Number of the person identified in data line <030>	2083662614 ext.
<039> Contact Email Address: Email of the person identified in data line <030>	susan.case@ruraltel.org
Form Type	54.313 and 54.422

**(100) Service Quality Improvement Reporting
Data Collection Form**

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

<010> Study Area Code 522418
 <015> Study Area Name PEND OREILLE TEL.
 <020> Program Year 2017
 <030> Contact Name - Person USAC should contact regarding this data Susan case
 <035> Contact Telephone Number - Number of person identified in data line <030> 2083662614 ext.
 <039> Contact Email Address - Email Address of person identified in data line <030> susan.case@ruraltel.org

<110> Has your company received its ETC certification from the FCC? (yes / no)
 If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC? (yes / no)

If your answer to Line <111> is yes, please file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

522418WA112.pdf

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

<113> Maps detailing progress towards meeting plan targets	Yes
<114> Report how much universal service (USF) support was received	Yes
<115> How much (USF) was used to improve service quality and how support was used to improve service quality	Yes
<116> How much (USF) was used to improve service coverage and how support was used to improve service coverage	Yes
<117> How much (USF) was used to improve service capacity and how support was used to improve service capacity	Yes
<118> Provide an explanation of network improvement targets not met in the prior calendar year.	Not Applicable

**(300) Unfulfilled Service Request
Data Collection Form**

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

<010> Study Area Code 522418
 <015> Study Area Name PEND OREILLE TEL.
 <020> Program Year 2017
 <030> Contact Name - Person USAC should contact regarding this data Susan case
 <035> Contact Telephone Number - Number of person identified in data line <030> 208362614 ext.
 <039> Contact Email Address - Email Address of person identified in data line <030> susan.case@ruraltel.org

<300> Unfulfilled service request (voice)

<310> Detail on attempts (voice) _____
Name of Attached Document

<320> Unfulfilled service request (broadband)

<330> Detail on attempts (broadband) _____
Name of Attached Document

REDACTED FOR PUBLIC INSPECTION

(400) Number of Complaints per 1,000 customers
Data Collection Form

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

<010>	Study Area Code	522418
<015>	Study Area Name	POND OREILLE TEL.
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Susan case
<035>	Contact Telephone Number - Number of person identified in data line <030>	2083662614 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	susan.case@ruraltel.org
<400>	Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize.	Offered only fixed voice
<410>	Complaints per 1000 customers for fixed voice	0.0010
<420>	Complaints per 1000 customers for mobile voice	
<430>	Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize.	Offered only fixed broadband
<440>	Complaints per 1000 customers for fixed broadband	0.0
<450>	Complaints per 1000 customers for mobile broadband	

REDACTED FOR PUBLIC INSPECTION

(500) Compliance With Service Quality Standards and Consumer Protection Rules
Data Collection Form

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

<010>	Study Area Code	522418
<015>	Study Area Name	PEND OREILLE TEL.
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Susan case
<035>	Contact Telephone Number - Number of person identified in data line <030>	2083662614 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	susan.case@ruraltel.org
<500>	Certify compliance with applicable service quality standards and consumer protection rules	Yes
<510>	Descriptive document for Service Quality Standards & Consumer Protection Rules Compliance	522418WA510 .pdf

(600) Functionality in Emergency Situations
Data Collection FormFCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013**REDACTED FOR PUBLIC INSPECTION**

<010> Study Area Code	522418
<015> Study Area Name	FEND OREILLE TEL.
<020> Program Year	2017
<030> Contact Name - Person USAC should contact regarding this data	Susan case
<035> Contact Telephone Number - Number of person identified in data line <030>	2083662614 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	susan.case@ruraltel.org
<600> Certify compliance regarding ability to function in emergency situations	Yes
<610> Descriptive document for Functionality in Emergency Situations	522418WA610.pdf

(900) Tribal Lands Reporting Data Collection Form

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

<010> Study Area Code 522418
 <015> Study Area Name PEND OREILLE TEL.
 <020> Program Year 2017
 <030> Contact Name - Person USAC should contact regarding this data Susan case
 <035> Contact Telephone Number - Number of person identified in data line <030> 2083662614 ext.
 <039> Contact Email Address - Email Address of person identified in data line <030> susan.case@ruraltel.org

<900> Does the filing entity offer tribal land services? (Y/N) Yes

<910> Tribal Land(s) on which ETC Serves
 Kalispel Tribal Community

<920> Tribal Government Engagement Obligation
 522418WA920.pdf

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each of these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

Select Yes or No or Not Applicable
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

(1000) Voice and Broadband Service Rate Comparability Data Collection Form

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

<010>	Study Area Code	522418
<015>	Study Area Name	PEND ORELLIE TEL.
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Susan case
<035>	Contact Telephone Number - Number of person identified in data line <030>	2083662614 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	susan.case@ruraltel.org

<1000>	Voice services rate comparability certification	Yes	
<1010>	Attach detailed description for voice services rate comparability compliance	522418WA1010 . pdf	Name of Attached Document
<1020>	Broadband comparability certification	No	
<1030>	Attach detailed description for broadband comparability compliance		Name of Attached Document

**(1100) No Terrestrial Backhaul Reporting
Data Collection Form**

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

<010>	Study Area Code	522418
<015>	Study Area Name	PEND OREILLE TEL.
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Susan case
<035>	Contact Telephone Number - Number of person identified in data line <030>	2083662614 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	susan.case@ruraltel.org

<1100> Certify whether terrestrial backhaul options exist (Y/N)

Yes

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

**(1200) Terms and Condition for Lifeline Customers
Lifeline
Data Collection Form**

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

<010>	Study Area Code	522418
<015>	Study Area Name	PEND OREILLE TEL.
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Susan case
<035>	Contact Telephone Number - Number of person identified in data line <030>	2083662614 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	susan.case@ruraltel.org

522418WA1200.pdf

Name of Attached Document

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

<1220> Link to Public Website HTTP

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- <1221>** Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,
- <1222>** Details on the number of minutes provided as part of the plan,
- <1223>** Additional charges for toll calls, and rates for each such plan.

(2000) Price Cap Carrier Additional Documentation (Continued)

Data Collection Form

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

<2016> Certification support used to build broadband

Connect America Phase II Reporting {47 CFR § 54.313(e)}

<2017A> Connect America Fund Phase II recipient?

<2017B> Attach information for Phase II - 54.313(e)(1) - list of geocoded locations already meeting the 54.309 public interest obligations at the end of calendar year 2015 and total amount of Phase II support, if any, the price

cap carrier used for capital expenditures in 2015.

<2018> Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(2)(ii)

<2019> Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(2)(v)

<2020> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 40% of its supported locations in the state on December 31, 2017 - 54.313(e)(3)

<2021> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 60% of its supported locations in the state on December 31, 2018 - 54.313(e)(4)

<2026> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 80% of its supported locations in the state on December 31, 2019 - 54.313(e)(5)

<2027> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 100% of its supported locations in the state on December 31, 2020 - 54.313(e)(6)

REDACTED FOR PUBLIC INSPECTION

[Redacted]

[Redacted]

[Redacted]

Name of Attached Document Listing Required Information

[Redacted]

Name of Attached Document Listing Required Information

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

<010>	Study Area Code	522418
<015>	Study Area Name	PEND OREILLE TEL.
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Susan case
<035>	Contact Telephone Number - Number of person identified in data line <030>	2083662614 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	susan.case@ruraltel.org

Complete the items below to note compliance with five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

Progress Report on 5 Year Plan
 (3009) Carrier certifies to 54.313(f)(1)(iii)

(3010A) Milestone Certification (47 CFR § 54.313(f)(1)(i)) Yes - Attach Certification

(3010B) Please Provide Attachment Name of Attached Document Listing Required Information

(3012A) Community Anchor Institutions (47 CFR § 54.313(f)(1)(iii)) No - No New Community Anchors

(3012B) Please Provide Attachment Name of Attached Document Listing Required Information

(3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2)) (Yes/No) Yes No

(3014) If yes, does your company file the RUS annual report (Yes/No) Yes No

Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)

(3016) Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows

(3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation Name of Attached Document Listing Required Information

(3018) If the response is no on line 3014, is your company audited? (Yes/No) Yes No

If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:

(3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers

(3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3021) Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit.

If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:

(3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers

(3023) Underlying information subjected to a review by an independent certified public accountant

(3024) Underlying information subjected to an officer certification.

(3025) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3026) Attach the worksheet listing required information Name of Attached Document Listing Required Information

(3005) Rate Of Return Carrier Additional Documentation (Continued)
 Data Collection Form

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

<010> Study Area Code 522418
 <015> Study Area Name PEND OREILLE TEL.
 <020> Program Year 2017
 <030> Contact Name - Person USAC should contact regarding this data Susan case
 <035> Contact Telephone Number - Number of person identified in data line <030> 2083662614 ext.
 <039> Contact Email Address - Email Address of person identified in data line <030> susan.case@ruraltel.org



Financial Data Summary
 (3027) Revenue
 (3028) Operating Expenses
 (3029) Net Income
 (3030) Telephone Plant In Service(TPIS)
 (3031) Total Assets
 (3032) Total Debt
 (3033) Total Equity
 (3034) Dividends

<010>	Study Area Code	522418
<015>	Study Area Name	PEND ORVILLE TEL.
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Susan case
<035>	Contact Telephone Number - Number of person identified in data line <030>	2083662614 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	susan.case@ruraltel.org

4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission's public interest obligations. All RBE participants must provide a response to Line 4001.

4001. Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

Community Anchor Institutions – FCC 14-98 (paragraph 79)

4003a. RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

If yes to 4003A, please provide a response for 4003B.

4003b. Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year. Name of Attached Document Listing Required Information _____

Broadband Deployment Locations – FCC 14-98 (paragraph 80)

4004a. Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481. Name of Attached Document Listing Required Information _____

4004b. Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband speed and data usage allowances available in the relevant geographic area. Name of Attached Document Listing Required Information _____

REDACTED FOR PUBLIC INSPECTION

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010> Study Area Code	522418
<015> Study Area Name	PEND OREILLE TEL.
<020> Program Year	2017
<030> Contact Name - Person USAC should contact regarding this data	Susan case
<035> Contact Telephone Number - Number of person identified in data line <030>	2083662614 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	susan.case@ruraltel.org

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	PEND OREILLE TEL.
Signature of Authorized Officer:	CERTIFIED ONLINE Date 06/24/2016
Printed name of Authorized Officer:	Mark Martell
Title or position of Authorized Officer:	Vice President
Telephone number of Authorized Officer:	2083662614 ext.
Study Area Code of Reporting Carrier:	522418 Filing Due Date for this form: 07/01/2016
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

REDACTED FOR PUBLIC INSPECTION

Certification - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010> Study Area Code	522418
<015> Study Area Name	PEND OREILLE TEL.
<020> Program Year	2017
<030> Contact Name - Person USAC should contact regarding this data	Susan case
<035> Contact Telephone Number - Number of person identified in data line <030>	2083662614 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	susan.case@ruraltel.org

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
<p>I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.</p>	
Name of Authorized Agent:	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date:
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
<small>Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.</small>	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
<p>I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.</p>	
Name of Reporting Carrier:	
Name of Authorized Agent Firm:	
Signature of Authorized Agent or Employee of Agent:	Date:
Name of Authorized Agent Employee:	
Title or position of Authorized Agent or Employee of Agent:	
Telephone number of Authorized Agent or Employee of Agent:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
<small>Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.</small>	

Attachments

REDACTED FOR PUBLIC INSPECTION

LINE 112 – Five Year Service Quality Improvement Progress Report

REDACTED FOR PUBLIC INSPECTION

REDACTED FOR PUBLIC INSPECTION

LINE 200 SERVICE QUALITY OUTAGE REPORTING

REDACTED FOR PUBLIC INSPECTION

Response Line 510
Pend Oreille Telephone Company
Study Area 522418

Voice Network

Pursuant to 47 C.F.R. § 54.313(a)(5) and or 47 C.F.R. § 54.422(b)(3) Pend Oreille Telephone Company (“POTC”) is in compliance with appropriate FCC Service Quality Standards and Consumer Protection Rules. POTC provides CPNI training to all of its new employees and in addition trains all of its existing employees on an annual basis. ILEC also conducts subscriber outreach regarding CPNI by placing CPNI explanation onto its website at www.rtc.net which informs subscribers about CPNI rules and other applicable customer rights and obligations. In addition POTC trains staff on Red Flag issues on an annual basis. All company employees are required to sign and acknowledge that they have completed CPNI and Red Flag training and understand obligations to adherence of applicable rules.

POTC also outlines its rates, terms, and conditions under which POTC offers service in its Local Exchange Tariff. The tariff explains customer rights and obligations, customer service, dispute resolution, deposits, billing and payment options, disconnection of service as well as cancellation of service options. POTC keeps its tariffs available for public inspection at its business offices.

Broadband Network

Pursuant to 47 C.F.R. § 54.313(a)(5) and or 47 C.F.R. § 54.422(b)(3) POTC is in compliance with applicable FCC Service Quality Standards and Consumer Protection Rules. ILEC trains staff on applicable rules for broadband services issues on an annual basis. In addition POTC has placed on its website at www.rtc.net its network practices and policies regarding FCC’s Net Neutrality Rules.

ILEC also outlines its rates, terms, and conditions under which POTC offers Broadband service in NECA Tariff #5 to Internet Service Providers (“ISP”). The Tariff explains customer rights and obligations, customer service, dispute resolution, deposits, billing and payment options, disconnection of service as well as cancellation of service options. Public inspection of NECA Tariff #5 can be found on NECA’s website. Retail DSL rates, terms, and conditions for retail services are provided by the ISP.

Response Line 610
Pend Oreille Telephone Company
Study Area 522418

Functionality in Emergency Situations:

Voice Network

Pursuant to 47 C.F.R. § 54.313(a)(6) and 47 C.F.R § 54.22(b)(4) as set forth in 47 C.F.R. § 54.202(a)(2) Pend Oreille Telephone Company (“POTC”) meets the requirements to remain functional in emergency situations and has the following capabilities: Back-up power is provided to POTC central offices by use of a fixed generator and batteries that provide it with 8 hours of emergency power. In addition, POTC field electronics have 8 to 12 hours of back-up power by use of fixed and mobile generators and batteries. POTC also has SONET technology deployed in its core fiber optic network that is self-healing and will automatically reroute traffic should a fiber cut occur. POTC has also sufficient spare cards for its fiber optic network to provide almost instantaneous replacement should there ever be a card failure in the core network. POTC also has proper staff in place to repair any fiber cuts in a timely manner. POTC has connectivity with neighboring telephone exchanges as well as the LATA tandem to provide diverse options to reroute traffic should an emergency arise. POTC has developed and trained its staff on network preparedness plans in case of emergency situations. POTC is prepared and capable of managing traffic spikes resulting from emergency situations and has sufficient switching capabilities to handle such situations.

Broadband Network

Pursuant to 47 C.F.R. § 54.313(a)(6) and 47 C.F.R § 54.22(b)(4) as set forth in 47 C.F.R. § 54.202(a)(2) Pend Oreille Telephone Company (“POTC”) meets the requirements to remain functional in emergency situations and has the following capabilities: Back-up power is provided to POTC central offices by use of a fixed generator and batteries that provide it with 8 hours of emergency power. In addition, POTC field electronics have 8 to 12 hours of back-up power by use of fixed and mobile generators and batteries. POTC also has SONET technology deployed in its core fiber optic network that is self-healing and will automatically reroute traffic should a fiber cut occur. POTC has also sufficient spare cards for its fiber optic network to provide almost instantaneous replacement should there ever be a card failure in the core network. POTC also has proper staff in place to repair any fiber cuts in a timely manner. POTC has connectivity with neighboring telephone exchanges as well as the LATA tandem to provide diverse options to reroute traffic should an emergency arise. POTC has developed and trained its staff on network preparedness plans in case of emergency situations.

Response Line 920
Pend Oreille Telephone Company
Study Area 522418

Tribal Lands Reporting:

Pend Oreille Telephone Company ("POTC") submits the following documentation in its Tribal Lands Report and submits the attached documentation. POTC has reached out to the Kalispel Tribal community on June 3, 2015 and October 14, 2015. As to date there has not been a response back from the tribal government. POTC will continue its outreach and is prepared to discuss obligations pursuant to 54.313(a)(9) with the Kalispel Tribal government.

Response to Line 1010
Pend Oreille Telephone Company
Study Area 522418

Voice Services Comparability Report

Pursuant to 47 C.F.R. § 54.313 (a) (10) Pend Oreille Telephone Company (“POTC”) is in compliance with the requirement that voice services is no more than two standard deviations above the national average urban rate for voice service of \$41.07 as specified in Public Notice DA 16-362 issued on April 5, 2015. POTC’s current total local end-user rate¹ of \$16.00 (which includes a local fee of \$13.75, mandated state fees of \$0.00 and mandatory extended area service charges of \$2.25) is not above the standard deviation as specified in the USF/ICC Transformation Order.²

¹ Local End User Rate as defined in USF/ICC Transformation Order 26 FCC Rcd at 17751, Para. 238

² USF/ICC Transformation Order, 26 FCC Rcd at 17694, Para. 84 (footnote included) “The standard deviation is a measure of dispersion. The sample standard deviation is the square root of the sample variance. The sample variance is calculated as the sum of the squared deviations of the individual observations in the sample of data from the sample average divided by the total number of observations in the sample minus one. In a normal distribution, about 68 percent of the observations lie within one standard deviation above and below the average and about 95 percent of the observations lie within two standard deviations above and below the average.”



REDACTED FOR PUBLIC INSPECTION

copy mailed 10/15/15 @

892 W. Madison Ave., Glenns Ferry, ID 83623

October 14, 2015

Kalispel Tribal Headquarters
Business Council
Glen Nenema, Chairman
P.O. Box 39
Usk, WA 99180

RE: Annual Tribal Government Engagement

Dear Chairman Nenema:

The Federal Communications Commission (FCC) issued a Public Notice on July 19, 2012 by the Office of Native Affairs and Policy; which provides guidance on Tribal obligation. The FCC adopted a Tribal government engagement requirement for all eligible telecommunications carriers that are currently serving or are seeking to serve tribal lands. The Tribal government engagement requirement is intended to benefit Tribal government leaders, communication service providers and consumers living on Tribal lands, ultimately providing greater connectivity, economic opportunities, education, health care and public safety.

Enclosed for your convenience, reference and review is a copy of the Public Notice released July 19, 2012, by the FCC's Office of Native Affairs and Policy, which provides further guidance on the Tribal government engagement obligations.

At your earliest convenience, I would sincerely appreciate hearing from you so we may coordinate and schedule a meeting to discuss: Needs assessment and deployment planning with a focus on Tribal community anchor institutions; Feasibility and sustainability planning; how best we may implement Marketing services to the Kalispel Tribe; Rights of way processes, land use permitting, facilities siting, environmental and cultural preservation review processes; and Compliance with Tribal business and licensing requirements. We realize these are important issues and vital to the successful deployment and provision of communication services on Tribal lands.

Sincerely,

Mark Martell
Administrative Manager

Enclosure



June 3, 2015

Kalispel Tribal Headquarters
Business Council
Glen Nenema, Chairman
P.O. Box 39
Usk, WA 99180

RE: Annual Tribal Government Engagement

Dear Chairman Nenema:

The Federal Communications Commission (FCC) issued a Public Notice on July 19, 2012 by the Office of Native Affairs and Policy; which provides guidance on Tribal obligation. The FCC adopted a Tribal government engagement requirement for all eligible telecommunications carriers that are currently serving or are seeking to serve tribal lands. The Tribal government engagement requirement is intended to benefit Tribal government leaders, communication service providers and consumers living on Tribal lands, ultimately providing greater connectivity, economic opportunities, education, health care and public safety.

Enclosed for your convenience, reference and review is a copy of the Public Notice released July 19, 2012, by the FCC's Office of Native Affairs and Policy, which provides further guidance on the Tribal government engagement obligations.

At your earliest convenience, I would sincerely appreciate hearing from you so we may coordinate and schedule a meeting to discuss: Needs assessment and deployment planning with a focus on Tribal community anchor institutions; Feasibility and sustainability planning; how best we may implement Marketing services to the Kalispel Tribe; Rights of way processes, land use permitting, facilities siting, environmental and cultural preservation review processes; and Compliance with Tribal business and licensing requirements. We realize these are important issues and vital to the successful deployment and provision of communication services on Tribal lands.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark Martell', is written over a faint, circular watermark or stamp.

Mark Martell
Administrative Manager

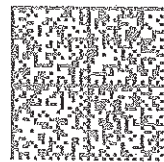
Enclosure



PEND OREILLE TELECOM

892 W. Madison Ave., Clenns Ferry, ID 83623

Kalispel Tribal Headquarters
Business Council
Glen Nenema, Chairman
P.O. Box 39
Usk, WA 99180



U.S. POSTAGE
PITNEY BOWES
ZIP 83623 \$000.48
02 1M
0001384324 JUN 03 2015

FIRST REVISED SHEET NO. 23
CANCELING ORIGINAL SHEET NO. 23

WN. U-1
PEND OREILLE TELEPHONE COMPANY

**NETWORK ACCESS RATES
PREMIUM CALLING SERVICE
RESIDENCE SERVICE**

RATES

Network Access Charge

Monthly
Rate

One Party

\$14.00

(I)
(D)

CONDITIONS

Rates apply within base rate areas and supplementary base rate areas. Service can be provided in suburban areas at additional charge (mileage). Rates include Extended Area Service differentials where applicable and a \$.25 Service Fee as provided in U85-23 for short-haul toll rates. An excise tax of \$.13 per month is applied in addition to the rates following for all network access lines to fund the Washington Telephone Assistance Program.

(T)

The above rates apply to the provision of network access lines which, when connected to a suitable telephone instrument provides access to the telephone network.

Instruments must be provided by the subscriber, subject to the conditions described in the Connection With Subscriber-Owned Equipment portion of this tariff.

Additional instruments may be attached to network access lines. The Company reserves the right to limit the number of instruments connected to an access line if they cause interference with the normal operation of the line.

(D)

Residence Rates Apply:

In private residence where business listing are not provided and telephone service is not used for the conduct of business.

In the place of residence of a clergyman, physician, or other medical practitioner provided the subscriber does not maintain an office in the residence.

(D)

Issued: March 29, 2013

Effective: May 1, 2013

Issued by: PEND OREILLE TELEPHONE COMPANY

By: James R. Martell

Title: President

WN.U - 1

PEND OREILLE TELEPHONE COMPANY

WASHINGTON TELEPHONE ASSISTANCE PROGRAM

As provided by Chapter 229, Laws of 1987, and revised by House Bill No. 2546 effective July 1, 1990, a residential subscriber or applicant for service who is certified eligible by the Department of Social and Health Services (DSHS) is eligible for the following assistance:

1. Reduction of the Service Connection Charges by 50 percent* (Does not apply to other nonrecurring charges such as line extension charges).
2. Waiver of the portion of the deposit which is associated with the local exchange service rate. (A deposit may still be required to cover toll service usage).
3. The normal service request or change charge which would apply when changing to a different type, class or grade of service will not apply when changing to the Washington Telephone Assistance Plan.
4. A discount sufficient to reduce the monthly rate for the lowest available grade** of flat rate local exchange telephone service to \$9.25 inclusive of the FCC's End User Access Charge.

* Subscribers or applicant for service who qualify for the Washington Telephone Assistance Program also qualify for a Link-Up America discount equal to the remaining Service Connection Charges or \$30.00, whichever is lowest.

** Low-income senior citizens sixty years of age and older and other low income persons identified by the DSHS as medically needy shall, where single-party service is available, be provided with single-party service as the lowest available grade of flat rate local exchange telephone service.

Issued Date: 3/1/97
Issued By: Pend Oreille Telephone Company
By: Jim Martell

Effective Date: 3/1/97
Advice No.
Title: President

WN.U - 1
PEND OREILLE TELEPHONE COMPANY

LINK-UP AMERICA PROGRAM

DEFINITION

Link-Up America is a national, consumer education and outreach program designed to provide economic opportunity to low income households which do not presently have telephone service. This plan pays for one half of service commencement nonrecurring charges up to \$30.00.

APPLICATION *

Link-Up America is provided for applicants who meet the following criteria:

- The recipient meets the income test for a general low income assistance program.
- Recipients are not dependents for federal income tax purposes unless over the age of 60.

FUNDING

Funding is provided entirely for charges assessed to Interexchange Carriers (IXC's).

* Subscribers or applicants for service who qualify for the Washington Telephone Assistance Program also qualify for the Link-Up America discount.

WN U-1

SECOND REVISED SHEET NO. 33
CANCELING FIRST REVISED SHEET NO. 33

PEND OREILLE TELEPHONE COMPANY

WASHINGTON TELEPHONE ASSISTANCE PROGRAM

The Company participates in the Washington Telephone Assistance Program (“WTAP”), as provided in RCW 80.36.410 through .470, and Chapters 480-122 and 388-273 of the Washington Administrative Code (collectively the “WTAP laws”), offers to eligible subscribers the WTAP and applies to switched access lines within its exchange areas the excise tax related to the WTAP described therein.

Subscribers eligible to participate in the WTAP, as well as certain subscribers eligible to participate under rules of the Federal Communications Commission, may also be eligible for the Lifeline service offering (“Lifeline service”) under Subpart E of Part 54 of Title 47, Code of Federal Regulations (“CFR”). Within the service areas for which the Company is designated as an “eligible telecommunications carrier” pursuant to Subpart C of Part 54 of Title 47 CFR, the Company offers Lifeline service to qualifying low-income consumers.

Lifeline service is a non-transferable retail local service offering that is available only to qualifying low-income consumers and for which qualifying low-income consumers pay charges that have been reduced in accordance with Subpart E of Part 54 of Title 47 CFR and, to the extent applicable, the WTAP laws. In addition, for “eligible residents of Tribal lands,” as defined in § 54.400 of Subpart E of Part 54 of Title 47 CFR, the Company's Lifeline service charges are further reduced in accordance with Subpart E of Part 54 of Title 47 CFR.

The Company's offering of Lifeline service includes “toll limitation” only in the form of “toll blocking” (and not “toll control”), as those terms are defined in Subpart E of Part 54 of Title 47 CFR. “Toll blocking” is available with respect to Company-provided Lifeline service at no Company charge to the Company's subscriber to such Lifeline service.

On the issue date of this tariff sheet, “toll blocking” is defined in § 54.400 of Subpart E of Part 54 of Title 47 CFR, as “a service provided by an eligible telecommunications carrier that lets subscribers elect not to allow the completion of outgoing toll calls from their telecommunications channel.” “Toll blocking” does not necessarily result in the blocking of collect calls to the subscriber's telephone line or the blocking of calls billed from another location to the subscriber's telephone line.

Issued: May 3, 2012

Effective: June 3, 2012

Issued by: Pend Oreille Telephone Company

By: Richard A. Finnigan

Title: Attorney

(C)

(C)

WN U-1

FIRST REVISED SHEET NO. 33.1

CANCELING ORIGINAL SHEET NO. 33.1

PEND OREILLE TELEPHONE COMPANY

WASHINGTON TELEPHONE ASSISTANCE PROGRAM - (Cont.)

If the service areas for which the Company is designated as an “eligible telecommunications carrier” pursuant to Subpart C of Part 54 of Title 47 CFR includes any “Tribal lands,” as that term is used in § 54.413 of Subpart E of Part 54 of Title 47 CFR, then, with respect to such “Tribal lands,” the Company also offers “Tribal Link Up,” as defined in § 54.413 of Subpart E of Part 54 of Title 47 CFR to “eligible residents of Tribal lands,” as defined in § 54.400 of Subpart E of Part 54 of Title 47 CFR. Tribal Link Up provides, under certain circumstances, (i) a reduction of the customary charge for commencing telecommunications service and (ii) other benefits pertaining to such charge and to interest charges, if any, that may apply thereto, all as specified more fully in Subpart E of Part 54 of Title 47 CFR.

(C)

The availability of the telephone assistance programs described in this schedule, or any of them, to any otherwise eligible subscriber or applicant may be subject to such subscriber or applicant granting his or her written consent to disclosure and/or transmission by the Company of certain information pertaining to that subscriber or applicant, including, but not necessarily limited to, his or her name, other subscriber- or applicant-identifying information, the service address to which the relevant telephone assistance program service is being applied for and/or is being furnished, the specific assistance program in which the subscriber or applicant participates or has applied to participate, and the date or dates of such participation or requested participation, all in accordance with the WTAP laws and/or Subpart E of Part 54 of Title 47 CFR.

(C)

Issued: May 3, 2012

Effective: June 3, 2012

Issued by: Pend Oreille Telephone Company

By: Richard A. Finnigan

Title: Attorney

Response to Line3010
Pend Oreille Telephone Company
Study Area 522418

Milestone Certification

Pursuant to 47 C.F.R. § 54.202(a) Pend Oreille Telephone Company ("POTC") provides this certification that it is taking reasonable steps to provide upon reasonable request broadband 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 offerings in urban areas as determined in an annual survey as specified in Public Notice DA 16-362 and that requests for such service are met within a reasonable amount of time. Details for how Pend Oreille Telephone Company is meeting its obligations for broadband goals and required obligations are specified within the FCC Form 481 annual filing.

REDACTED FOR PUBLIC INSPECTION

LINE 3026– Audited Financial Statements

REDACTED FOR PUBLIC INSPECTION