54.313(a)(1)

As they are known to the Company at the date of this Report, the planned investments and forecasted expenses related to Washington operations (Study Area Code 522423) for the period January 1, 2016 through December 31, 2020, are listed below. The Company expects to use all Universal Service Fund support received in order to fund the expenses related to the provisioning, maintenance and services provided over these upgraded facilities as well as existing facilities and to service the debt with the Rural Utility Service created in order to make these improvements; improving service quality, coverage and capacity. The Company (SAC 522423) received \$1,448,317 in federal high-cost support for the calender year ended December 31, 2015. The Company expects that the continued receipt of Universal Service Fund support will aid the Company's efforts to continue to provide the supported services at rates that are comparable to the rates for such services in urban areas of which all customers and potential customers in the Company's designated ETC service area will benefit.

The Company forecasted for 2014, that upgrades to the facilities in its Prescott and Uniontown exchanges would be \$1,350,000 and \$1,430,000, respectively; upgrading fiber-to-the-node. The actual costs that were capitalized were \$1,412,768 and \$2,008,504, respectively.

The Company forecasted for 2014 and 2015, that the upgrades to the facilities in its Roslyn exchange would total \$7,920,000; upgrading fiber-to-the-home. The amounts within the RUS Loan are \$1,916,220 for electronics and \$5,107,580 for outside plant; totaling \$7,023,800 which excludes estimated Engineering of \$1,100,000. The Company has until October 16, 2016, in order to complete all RUS projects.

The Company forecasted for 2015, that upgrades to the facilities in its Dewatto exchange would be \$650,000; upgrading fiber-to-the-node. As the completion of the FTTH in Roslyn is taking priority, this project is to commence in July, 2016; fiber has been ordered.

		2016	2017	2018	2019	<u>2020</u>
DEWATTO (372)						
Access Lines (@ 12/31/2015)	313					•
Data Subscribers (@ 12/31/2015)	230					•
Fiber to the Node		550,000				
Electronics		100,000				
TOTAL DEWATTO		650,000				
PRESCOTT (849)			Ī			
Access Lines (@ 12/31/2015)	148		1			
Data Subscribers (@ 12/31/2015)	83	ľ				
Electronics (upgrade to 25/3 standard)			250,000			
ROSLYN (649)						
Access Lines (@ 12/31/2015)	1,257					-
Data Subscribers (@ 12/31/2015)	977					
New Switch		180,000				
Fiber to the Premise		5,107,580				
Electronics		1,916,220				
Engineering		1,100,000				
TOTAL ROSLYN		8,303,800				
UNIONTOWN (229)						
Access Lines (@ 12/31/2015)	506					_
Data Subscribers (@ 12/31/2015)	233					
Electronics (upgrade to 25/3 standard)			400,000			
TOTAL	<u> </u>	8,953,800	650,000	0	0	C
FORECASTED OPERATING EXPENSES				-		-
PLANT SPECIFIC OPERATIONS		1,298,305	1,244,720	1,196,305	1,152,448	1,112,610
PLANT NON-SPECIFIC OPERATIONS		428,358	445,947	464,630	484,475	505,554
ACCUMULATED DEPRECIATION		1,473,122	1,613,122	1,613,122	1,613,122	1,613,122
CUSTOMER OPERATIONS EXPENSES		496,121	507,958	517,051	523,994	529,272
CORPORATE OPERATIONS EXPENSES		866,789	858,925	849,851	839,856	829,189
TOTAL OPERATING EXPENSES		4,562,695	4,670,672	4,640,959	4,613,894	4,589,746

AFFIDAVIT CONTAINING CERTIFICATIONS PURSUANT TO WAC 480-123-060 AND WAC 480-123-070

I, James K. Brooks, being of lawful age, state that I am the Treasurer/Controller of Inland Telephone Company ("Company"), that I am authorized to execute this Affidavit on behalf of the Company, and that the facts set forth in this Affidavit are true to the best of my knowledge, information and belief. On this basis, I hereby certify to the Washington Utilities and Transportation Commission ("Commission") for use by the Commission in providing the certification to the Federal Communications Commission and Universal Service Administrative Company required by 47 C.F.R. §54.314, as follows:

- (1) That the Company in 2015 used and in the coming calendar year will use federal high-cost universal service fund support provided to the Company in the State of Washington only for the provision, maintenance and upgrading of the facilities and services for which the support is intended;
- (2) That during the 2015 calendar year, the Company met substantially the applicable service quality standard and consumer protection rules found in WAC 480-123-030(1)(h);
- (3) That during the 2015 calendar year, the Company maintained the ability to function in emergency situations under the standard found in WAC 480-123-030(1)(g), as such standard relates to functionality of wireline carriers in emergency situations; and
- (4) That during the 2015 calendar year, the Company publicized the availability of its applicable telephone assistance programs in a manner reasonably designed to reach those likely to qualify for service and in a manner which, in the Company's judgment, included advertisements likely to reach those who are not current customers of the Company within the Company's designated service area.

I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Dated this 28th day of June, 2016, at Roslyn, Washington.

Company: Inland Telephone Company

James K. Brooks

Its: Treasurer/Controller

ANNUAL SECTION 64.2009(e) CERTIFICATION EB Docket No. 06-36

Annual § 64.2009(e) CPNI Certification for 2015

Dated: February 20, 2016

Company: Inland Telephone Company Form 499 Filer ID Number: 802299 Name of Signatory: James K. Brooks Title of Signatory: Treasurer/Controller

I, James K. Brooks, certify that I am a duly authorized officer of Inland Telephone Company ("Inland" hereafter) and, acting as an agent of Inland, that I have personal knowledge that Inland has established operating procedures that are adequate to ensure compliance with the Customer Proprietary Network Information ("CPNI") rules of the Federal Communications Commission ("Commission"), codified at 47 C.F.R. Part 64 Subpart U, implementing Section 222 of the Communications Act of 1934, as amended.

Accompanying this certification is a statement explaining how Inland's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules.

Inland has not taken any actions (proceedings instituted or petitions filed by Inland at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. During the calendar year ended December 31, 2015, Inland did not acquire first-hand any information that it has identified as being information with respect to the processes pretexters are using to attempt to access CPNI.

Inland has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Tames K. Brooks
Treasurer/Controller

STATEMENT REGARDING OPERATING PROCEDURES IMPLEMENTING 47 C.F.R. PART 64 SUBPART U GOVERNING USE OF CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) MARCH 1, 2016

The following statement explains how the operating procedures of Inland Telephone Company ("Inland" or "Company") ensure that it is in compliance with the Commission's CPNI rules, as codified at 47 C.F.R. Part 64 Subpart U (§§ 64.2001-64.2011) and is relevant to calendar year 2014. Except as otherwise indicated, the following applies with respect to the Commission's rules in effect both before and after the December 8, 2007 effective date of the Commission's April 2, 2007 Report and Order in CC Docket No. 96-115. See FCC 07-22 (rel. Apr. 2, 2007); Public Notice, DA 07-4915 (rel. Dec. 6, 2007). This statement covers calendar year 2014.

I. Use of customer proprietary network information without customer approval.

- A. Inland may use, disclose, or permit access to CPNI for the purpose of providing or marketing service offerings among the categories of service to which the customer already subscribes from Inland, without customer approval.
- **B.** Inland may not use, disclose, or permit access to CPNI to market to a customer, service offerings that are within a category of service to which the subscriber does not already subscribe from Inland, unless Inland has customer approval to do so, except as described in Section I.C.
 - (1) Inland may use, disclose or permit access to CPNI derived from their provision of local exchange service or interexchange service, without customer approval, for the provision of CPE and information services, such as call answering, voice mail or messaging, voice storage and retrieval services, and fax storage and retrieval services.
 - (2) Inland may not use, disclose or permit access to CPNI to identify or track customers that call competing service providers except for CPNI made available to other telecommunications carriers pursuant to tariffed or detariffed billing and collection arrangements and billing and collection services provided pursuant thereto. The Company does not sell CPNI to any third-party for any purpose.
- C. Inland may use, disclose, or permit access to CPNI, without customer approval, as follows:
 - (1) Inland may use, disclose, or permit access to CPNI, in its provision of inside wire installation, maintenance, and repair services.
 - (2) Inland may use CPNI to market services formerly known as adjunct-to-basic services, such as, but not limited to, speed dialing, computer-provided directory

assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller I.D., call forwarding, and certain Centrex features.

D. Inland may use, disclose, or permit access to CPNI to protect Inland's rights or property; to protect its users and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, Inland's services; and to render, provision, bill or collect for services.

Inland provides local exchange telephone service and access to long distance service providers in six exchanges in the states of Idaho and Washington. Inland's operating procedures comply with the above requirements and include, but are not limited to, the provisions described below. The Company does not engage in any outbound telemarketing. Outbound print marketing, if any, that may be distributed by the Company by mail is addressed to all subscribers or customers within the applicable geographic area, zip code(s) and/or telephone number prefix(es), without regard to the specific services that the subscriber or customer receives, or does not receive, from the Company and/or the Company's affiliates. Under Company policy, none of the Company's affiliates is permitted to use any CPNI of the Company for any outbound telemarketing or outbound print marketing.

Moreover, the Company does not use any CPNI for any inbound marketing of services that are not within a category of service (i.e., local and interexchange) to which the customer already subscribes from the Company and/or one or more of the Company's affiliates. The Company does not sell, or provide access to any third party to, any of the Company's CPNI for purposes of marketing the services of the Company or of any of its affiliates, other than as permitted without prior customer approval with respect to the Company's affiliates. Except for CPNI made available to other telecommunications carriers pursuant to tariffed or detariffed billing and collection arrangements and billing and collection services provided pursuant thereto, and pursuant to Commission-mandated carrier change procedures, the Company does not provide CPNI to any third-party for any purpose.

The Company, its employees and agents may make such other uses and disclosures of, and permit access to, CPNI without customer approval as are permitted by applicable statute, rule, regulation or order. Such uses, disclosures or access may include those authorized by Sections 222(c) and (d) of the Communications Act of 1934, as amended, by Section 64.2005 of the Commission's rules and by orders of the Commission.

Except as set forth above, the Company does not provide any CPNI to any governmental entity, or to any other third party, other than: pursuant to subpoena or other lawful process or with the subscriber's prior written consent, or in accordance with the authentication and other requirement described at Section IV below and in the FCC's rules, as a result of a person representing himself or herself to be the subscriber (or the subscriber's duly authorized agent) and having confirmed his or her identity or authority by providing to the Company appropriate identifying information (such as Social Security Number, driver's license number, mother's maiden name, user name or password, as appropriate or otherwise required).

II. Approval required for use of customer proprietary network information.

- A. Inland may obtain customer approval through written, oral or electronic methods.
- (1) Inland does not seek or obtain oral approval, and therefore does not bear the burden of demonstrating that such approval has been given in compliance with the FCC's rules.
- (2) A customer's approval or disapproval obtained by Inland to use, disclose, or permit access to the customer's CPNI, the use of CPNI outside of the customer's total service relationship with Inland must remain in effect until the customer revokes or limits such approval or disapproval.
- (3) Inland must maintain records of notification and approval, whether oral, written or electronic, for at least one year.

B. Use of Opt-Out and Opt-In Approval Processes.

- (1) Except where use, disclosure, or access to CPNI is otherwise permitted without prior customer approval (as described above), Inland only uses, discloses or permits access to CPNI upon opt-out or opt-in approval, consistent with Section 64.2007 of the Commission's rules and, by December 8, 2007, with the Commission's amended rules. Inland's process is described in Section II.A above.
- (2) Except for use and disclosure of CPNI that is permitted without customer approval under Section I, or that is described Section II.B, or as otherwise provided in section 222 of the Communications Act of 1934, as amended, Inland may only use, disclose, or permit access to its customer's individually identifiable CPNI subject to optin approval.

The Company currently does not use CPNI in a manner that requires prior customer approval. Should Inland's policy change, however, Inland shall implement the foregoing policies to ensure the FCC's rules are complied with.

III. Notice required for use of customer proprietary network information.

A. Notification, Generally.

- (1) Prior to any solicitation for customer approval, Inland must provide notification to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI.
- (2) Inland must maintain records of notification, whether oral, written or electronic, for at least one year.
- **B.** Individual notice to customers must be provided when soliciting approval to use, disclose, or permit access to customers' CPNI.

C. Content of Notice.

Customer notification must provide sufficient information to enable the customer to make an informed decision as to whether to permit Inland to use, disclose, or permit access to, the customer's CPNI.

- (1) The notification must state that the customer has a right, and Inland has a duty, under federal law, to protect the confidentiality of CPNI.
- (2) The notification must specify the types of information that constitute CPNI and the specific entities that will receive the CPNI, describe the purposes for which CPNI will be used, and inform the customer of his or her right to disapprove those uses, and deny or withdraw access to CPNI at any time.
- (3) The notification must advise the customer of the precise steps the customer must take in order to grant or deny access to CPNI, and must clearly state that a denial of approval will not affect the provision of any services to which the customer subscribes. However, Inland may provide a brief statement, in clear and neutral language, describing consequences directly resulting from the lack of access to CPNI.
 - (4) The notification must be comprehensible and must not be misleading.
- (5) If written notification is provided, the notice must be clearly legible, use sufficiently large type, and be placed in an area so as to be readily apparent to a customer.
- (6) If any portion of a notification is translated into another language, then all portions of the notification must be translated into that language.
- (7) Inland may state in the notification that the customer's approval to use CPNI may enhance Inland's ability to offer products and services tailored to the customer's needs. Inland also may state in the notification that it may be compelled to disclose CPNI to any person upon affirmative written request by the customer.
- (8) Inland may not include in the notification any statement attempting to encourage a customer to freeze third-party access to CPNI.
- (9) The notification must state that any approval or denial of approval for the use of CPNI outside of the service to which the customer already subscribes from Inland is valid until the customer affirmatively revokes or limits such approval or denial.
- (10) Inland's solicitation for approval must be proximate to the notification of a customer's CPNI rights.

D. Notice Requirements Specific to Opt-Out.

Inland must provide notification to obtain opt-out approval through electronic or written methods, but not by oral communication (except as provided in paragraph F of this section). The

contents of any such notification must comply with the requirements of paragraph C of this section.

- (1) Inland must wait a 30-day minimum period of time after giving customers notice and an opportunity to opt-out before assuming customer approval to use, disclose, or permit access to CPNI. Inland may, in its discretion, provide for a longer period. Inland must notify customers as to the applicable waiting period for a response before approval is assumed.
 - (i) In the case of an electronic form of notification, the waiting period shall begin to run from the date on which the notification was sent; and
 - (ii) In the case of notification by mail, the waiting period shall begin to run on the third day following the date that the notification was mailed.
- (2) Insofar as Inland is using the opt-out mechanism, it must provide a Notice to its customers every two years.
- (3) If Inland uses e-mail to provide opt-out notices, it must comply with the following requirements in addition to the requirements generally applicable to notification:
 - (i) Inland must obtain express, verifiable, prior approval from consumers to send notices via e-mail regarding its service in general, or CPNI in particular;
 - (ii) Inland must allow customers to reply directly to e-mails containing CPNI notices in order to opt-out;
 - (iii) Opt-out e-mail notices that are returned to Inland as undeliverable must be sent to the customer in another form before Inland may consider the customer to have received notice;
 - (iv) Inland must ensure that the subject line of the message clearly and accurately identifies the subject matter of the e-mail; and
 - (v) Inland must make available to every customer a method to opt-out that is of no additional cost to the customer and that is available 24 hours a day, seven days a week. Inland may satisfy this requirement through a combination of methods, so long as all customers have the ability to opt-out at no cost and are able to effectuate that choice whenever they choose.

E. Notice Requirements Specific to Opt-In.

Inland may provide notification to obtain opt-in approval through oral, written, or electronic methods. The contents of any such notification must comply with the requirements of paragraph C of this section.

F. Notice Requirements Specific to One-Time Use of CPNI.

- (1) Inland may use oral notice to obtain limited, one-time use of CPNI for inbound and outbound customer telephone contacts for the duration of the call, regardless of whether Inland uses opt-out or opt-in approval based on the nature of the contact.
- (2) The contents of any such notification must comply with the requirements of paragraph C of this section, except that Inland may omit any of the following notice provisions if not relevant to the limited use for which Inland seeks CPNI:
 - (i) Inland need not advise customers that if they have opted-out previously, no action is needed to maintain the opt-out election;
 - (ii) Inland need not advise customers that they may share CPNI with their affiliates or third parties and need not name those entities, if the limited CPNI usage will not result in use by, or disclosure to, an affiliate or third party;
 - (iii) Inland need not disclose the means by which a customer can deny or withdraw future access to CPNI, so long as Inland explains to customers that the scope of the approval Inland seeks is limited to one-time use; and
 - (iv) Inland may omit disclosure of the precise steps a customer must take in order to grant or deny access to CPNI, as long as Inland clearly communicates that the customer can deny access to his CPNI for the call.

The Company currently does not use CPNI in a manner that requires prior customer approval. Should Inland's policy change, however, Inland shall implement the foregoing policies to ensure the FCC's rules are complied with.

IV. Safeguards required for use and disclosure of customer proprietary network information.

- A. Inland must implement a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI. Inland's policies and procedures are detailed in Section II above.
- B. Effective December 8, 2007, Inland may release call detail information during a customer initiated telephone contact only if reasonable authentication procedures are complied with and (1) the customer provides Inland with a pre-established password, (2) Inland, at the customer's request, sends the call detail information to the customer's address of record provided the address of record has been associated with the account for at least thirty (30) days, or (3) when Inland calls the telephone number of record to disclose the call detail information. Inland is permitted to create a back-up customer authentication method for lost or forgotten passwords. Inland is also prohibited from releasing call detail information during a retail visit without the appropriate password or valid photo identification.

However, if the during a customer-initiated telephone contact, the customer is able to provide without assistance from Inland personnel all of the call detail information necessary to

address a customer service issue (i.e., the telephone number called, when it was called, and if applicable the amount charged for the call), then Inland personnel are permitted to proceed with its routine customer care procedures.

- C. Not later than June 8, 2008, Inland must authenticate a customer without readily available biographical or account information prior to allowing the customer on-line access to CPNI related telecommunication service account. Once authenticated, the customer may only obtain on-line access to CPNI related telecommunications service account through a password.
- **D.** Effective December 8, 2007, Inland is required to notify customers immediately when a password or back-up means of authentication for lost or forgotten passwords, on-line account, or address of record is created or changed. Such notification is not required when the customer initiates service, including the selection of a password.
- E. Business customers are exempt from the password requirements which became effective December 8, 2007, if: the customer is contractually bound to Inland, is serviced by a dedicated Inland account representative as the primary contact, and within the contract Inland is responsible to address its CPNI obligations. If, at any point, the business customer must go through a call center to reach a customer service representative, then the exemption does not apply.
- **F.** Inland trains its personnel as to when they are and are not authorized to use CPNI, and Inland must have an express disciplinary process in place.
- G. Inland must maintain a record, electronically or in some other manner, of its own and its affiliates' sales and marketing campaigns that use its customers' CPNI. Inland shall maintain a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record must include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign. Inland shall retain the record for a minimum of one year.
- **H.** Inland must establish a supervisory review process regarding its compliance with the FCC's CPNI rules for outbound marketing situations and maintain records of its compliance for a minimum period of one year. Specifically, sales personnel must obtain supervisory approval of any proposed outbound marketing request for customer approval.
- I. Effective December 8, 2007, Inland must take reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI, which may include encryption of its databases. Inland must properly authenticate a customer prior to disclosing CPNI based on a customer-initiated telephone contact, on-line account access, or an in-store visit.

Inland must take measures to protect CPNI stored in its internal databases from potential unauthorized access, and evaluate and increase its security measures should it discover an increase in attempts to gain access to unauthorized information.

J. Inland must provide written notice within five business days to the FCC of any instance where the opt-out mechanisms do not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.

- (1) The notice shall be in the form of a letter, and shall include Inland's name, a description of the opt-out mechanism(s) used, the problem(s) experienced, the remedy proposed and when it will be/was implemented, whether the relevant state commission(s) has been notified and whether it has taken any action, a copy of the notice provided to customers, and contact information.
- (2) Such notice must be submitted even if Inland offers other methods by which consumers may opt-out.
- K. Effective December 8, 2007, Inland has a general duty to first inform federal law enforcement agencies, followed up by notification to affected customers, after reasonable determination of a breach of its customers' CPNI.
 - (1) Inland must file an electronic notification to the United States Secret Service (USSS) and the Federal Bureau of Investigation (FBI) within seven (7) business days through the central reporting facility furnished by the Commission.
 - (2) Inland is prohibited from notifying customers or the general public of the breach until seven (7) business days have passed after notification to the USSS and FBI unless under certain specified circumstances: (a) Inland identifies an "extraordinary need to notify customers" before that period or (b) An ongoing or potential investigation or national security requires customer disclosure to be potentially delayed for up to thirty (30) days. Inland must notify the affected customer(s) after the applicable period.
 - (3) Inland must maintain a record, whether electronically or in some other manner of any breaches discovered, notifications made to the USSS or FBI and notifications made to customers. The record must include, if available, dates of discovery and notification, a detailed description of the CPNI that was the subject of the breach, and the circumstances of the breach. Records must be maintained for a two (2) year period.

Inland's operating procedures comply with all of the above requirements, including those that became effective December 8, 2007. With respect to online authentication in particular, Inland implemented measures to ensure compliance by the applicable June 8, 2008 deadline. As previously discussed, the Company currently does not use CPNI in a manner that requires prior customer approval. Should Inland's policy change, however, Inland shall implement the relevant aforementioned policies to ensure the FCC's rules are complied with. Inland notes in particular that:

- Company personnel are trained as to when they are and are not authorized to use CPNI, and that an express process is in place such that violations of these procedures may result in disciplinary action, up to and including termination of employment.
- Inland does not provide customers' with online access to their CPNI at this time.
- With respect to business customers subject to Section IV.E above, Inland requires them
 to provide the names of all that are authorized to have access to the account and at
 what authorization level (e.g. to make service changes, request additional services,

billing inquiries) and further requires that a 6 to 10-place alphanumeric password be established.

 Operating procedures have been implemented to comply with the remaining requirements described above and applicable to Inland's use, disclosure of and third party access to CPNI.

V. Supplemental Information

Effective December 8, 2007, the FCC's rules require that the annual certification filed pursuant to 47 C.F.R. § 64.2009(e) disclose any actions taken against data brokers and a summary of all consumer complaints received in the previous calendar year regarding the unauthorized release of CPNI. Inland is not aware of any consumer complaints regarding the unauthorized release of CPNI and has not taken action against any data brokers.

Ability to Remain Functional in Emergencies Certification §54.313(a)(6)

ETCs must demonstrate that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to re-route traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.

I, James K. Brooks, being of lawful age, state that I am Treasurer/Controller of Inland Telephone Company ("Company")(SAC 522423), that I am authorized to execute this certification on behalf of the Company, and that the facts set forth in this certification are true to the best of my knowledge, information and belief.

On this basis, the Company certifies to the Washington Utilities and Transportation Commission, pursuant to 47 C.F.R. § 64.2009(e), that the Company's operating procedures are adequate to ensure compliance with the Customer Proprietary Network Information rules and regulations as set forth in 47 C.F.R. §§ 64.2001 through 64.2009.

The Company maintained the ability to function in emergency situations under the standard found in WAC 480-123-030(1)(g) and in 47 C.F.R. §54.201(a)(2), as such standards relate to functionality of wireline carriers in emergency situations. The Company further certifies that it maintains back-up power to ensure functionality without an external power source in the forms of auxiliary generators and batteries in its central offices as well as adequate battery back-up in its subscriber carrier cabinets and that its switching capability is more than adequate to manage the traffic of its subscribers.

For calls within the exchange of Uniontown, depending upon where a cut is made, there exists redundant toll routing however, the other exchanges have no redundant toll routing. In all exchanges, customers can continue to make calls within the exchange should the interexchange interconnected facilities get disconnected. The Company does not have ring technology at this time however, the Company is looking at redundant routing alternatives.

I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Dated this 28th day of June, 2016 at Roslyn, Washington.

James K. Brooks

₹reasurer/Controller

Voice Services Rate Comparability Certification and Residential Lines §54.313(a)(10)

ETCs that are ILEC recipients of high-cost support must report the number of residential service lines for which the sum of the rate and state fees are below \$21.93 as of June 1, 2016. In addition, each ETC, including competitive ETCs, must certify that the pricing of the voice services is no more than \$41.07.

I, James K. Brooks, being of lawful age, state that I am Treasurer/Controller of Inland Telephone Company ("Company"), Study Area Code 522423, that I am authorized to execute this certification on behalf of the Company, and that the facts set forth in this certification are true to the best of my knowledge, information and belief.

On this basis, the Company certifies, pursuant to 47 C.F.R. § 54.313(a)(10), that the Company's pricing of its voice services is no more than \$47.48.

The Company further submits the following residential service lines and rates; excluding the Federal Subscriber Line Charge of \$6.50:

Exchange	Rate Type	Count	Base Res. Rate	State SLC	State USF Fee	Mand. EAS Charge	Total Per Res.
DEWATTO (372)	Residential	289	22.00	0	0	0	22.00
PRESCOTT (849)	Residential	104	18.00	0	0	0	18.00
PRESCOTT (849)	Res-Measured	2	18.00	0	0	0	18.00
ROSLYN (649)	Residential	1,105	18.00	0	0	0	18.00
ROSLYN (649)	Res-Measured	10	18.00	0	0	0	18.00
UNIONTOWN (229)	Residential	279	18.00	0	0	0	18.00
UNIONTOWN (229)	Res-Measured	11	18.00	0	0	0	18.00

I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Dated this 28th day of June, 2016 at Roslyn, Washington.

James K. Brooks

Treasurer/Controller

Broadband Services Rate Comparability Certification §54.313(a)(12)

ETCs that are ILEC recipients of high-cost and/or Connect America Fund support must certify that one of their broadband services, which meet public interest obligations, is not more that the applicable benchmark announced annually in a public notice issued by the FCC's Wireline Competition Bureau.

I, James K. Brooks, being of lawful age, state that I am Treasurer/Controller of Inland Telephone Company ("Company"), Study Area Code 522423, that I am authorized to execute this certification on behalf of the Company, and that the facts set forth in this certification are true to the best of my knowledge, information and belief.

The Company offers at least one broadband service plan that meets the relevant metrics in its Roslyn exchange, however, the Company does not currently meet the pricing benchmark for the minimum speed standard of 10 Mbps downstream and 1 Mbps upstream in its Dewatto, Prescott and Uniontown exchanges. On this basis, the Company believes that it cannot certify, pursuant to 47 C.F.R. § 54.313(a)(12) of its compliance.

I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Dated this 28th day of June, 2016 at Roslyn, Washington.

James K. Brooks

Treasurer/Controller



LIFELINE ASSISTANCE

From Inland Telephone Company Do you qualify for discounted monthly telephone service?

Lifeline Discounts

Inland Telephone Company (d/b/a Inland Networks) customers may be eligible to currently save \$9.25 per month through the Federal Lifeline Program and, for Idaho residents, an additional \$2.50 per month through the Idaho Telecommunications Service Assistance Program (ITSAP), administered through the Community Action Partnership Association of Idaho (CAPAI).

Qualifying for Federal Lifeline

Customers may qualify for Federal Lifeline assistance if they are currently participating in one or more of the following assistance programs:

- Medicaid
- Supplemental Security Income (SSI)
- ➤ Temporary Assistance for Needy Families (TANF)
- Federal Public Housing Assistance (FPHA) or Section 8
- Supplemental Nutrition Assistance Program (SNAP)(Food Stamps)
- > Low Income Home Energy Assistance Program (LIHEAP)
- National School Lunch Program's Free Lunch Program

Additionally, customers may qualify for Federal Lifeline if their total household income is at or below 135% of the Federal Poverty Guideline.

Customers who are also residents of federally recognized Tribal Lands may qualify for additional Federal Lifeline support of up to \$25 per month and may qualify for Lifeline under the assistance programs listed above or if they currently participate in one or more of the following assistance programs:

- > Bureau of Indian Affairs General Assistance
- > Tribally Administered Temporary Assistance for Needy Families (TTANF)
- > Head Start (must satisfy income qualifying standard)
- Food Distribution Program on Indian Reservations (FDPIR)

Signing-Up for Lifeline Service

If you believe that you may qualify for Federal assistance, you must complete an application that can be obtained from a Customer Service Representative at 1-800-462-4578.

For State assistance, Inland Telephone Company still asks that you complete an application however, qualifying for State assistance must be done through the applicable State agency; CAPAI for Idaho residents.

Additional Information

For additional information about the Federal Lifeline program, please visit www.usac.org/li.

Important Information

Lifeline assistance is a government assistance program that provides only eligible consumers with discounted service that is non-transferable and is available for *only one discount per household*. A household is defined, for purposes of the Lifeline program, as any individual or group of individuals living at the same address that share income and expenses. The Lifeline assistance is only available in areas where the company has Eligible Telecommunications Carrier status. The Federal Communications Commission has mandated that all recipients of Federal Lifeline certify their eligibility annually.

INLAND TELEPHONE COMPANY

103 S. 2ND Street P.O. Box 171 Roslyn, WA 98941 (509) 649-2211; (800) 462-4578 Fax: (509) 649-2555 Email: custserv@inlandnet.com

CERTIFICATION BY CUSTOMER IN ORDER TO RECEIVE FEDERAL LIFELINE SUPPORT

	respond comp <mark>ount holder</mark> .	oletely. Inaccurate or incomplete responses	may cause y	our applica	ation to be rejected.	. Information provided should	be that of
Custon	ner Name: _		18 W	1.00	Telephone Number	r	
Service	Address:				City:	State	»:
Billing	Address:	4.2	are the		City:	State	::
Last 4	Digits of Soci	al Security Number:			D	ate of Birth:	
INCOM	ME ELIGIBI	LITY (DOCUMENTATION REQUIRED)					
	I certify tha	t my household income is at or below 135%	of the feder	al poverty g	guidelines and there	fore I qualify for Lifeline Suppo	ort under
1		income requirements and have provided pro					
		CK the corresponding box for the number of hou	sehold memb		ć20.20 <i>4</i>		
	1	\$16,038	Ш	5	\$38,394		
	2	\$21,627		6	\$43,983		
	3	\$27,216		7	\$49,586		
	4	\$32,805		8	\$55,202		
		For each additional household member add		#	\$5,616	# of Additional:	
	NOTE: THE ABO	VE AMOUNTS ARE 2016 FEDERAL POVERTY LEVELS; SUBJ	CT TO CHANGE	ANNUALLY.		<u> </u>	39-7-9-80
l certify	that I qualify ng a copy of m Federal Pub Section 8	AM ELIGIBILITY for Lifeline Support and am currently partici y benefit or program participation card or a lic Housing Assistance (FPHA) or		(Please che Medicai	ck all applicable bo	xes)	ıd am
	Supplement (SNAP)(Food	al Nutrition Assistance Program d Stamps)		Tempor	ary Assistance for Ne	eedy Families (TANF)	
	Low Income (LIHEAP)	Home Energy Assistance Program		Nationa	l School Lunch Progr	am's free lunch program	
	Supplement	al Security Income (SSI)					
I certify recognize participa	that I qualify f zed Indian trib ate in one or r	ELIGIBILITY Tribal Ide for tribal Lifeline Support, as I reside on land e's reservation, Pueblo, or Colony including more of the programs listed that I have check check all applicable boxes)	former reser	the Bureau rvations in (Oklahoma, Alaska Na	ative regions, and Indian Allotr	ments) <u>AND</u>
Ш	Federal Pub Section 8	lic Housing Assistance (FPHA) or		Bureau o	of Indian Affairs Gen	eral Assistance	
	Supplement (SNAP)(Food	al Nutrition Assistance Program i Stamps)		Tribal Ac (TTANF)		ary Assistance for Needy Famil	lies
	Low Income (LIHEAP)	Home Energy Assistance Program		Tempora	ary Assistance for Ne	eedy Families (TANF)	
	National Sch	ool Lunch Program's free lunch program		Food Dis	tribution Program o	n Indian Reservations (FDPIR)	

INLAND TELEPHONE COMPANY 103 S. 2ND Street (509) 649-2211; (800) 462-4578 P.O. Box 171 Fax: (509) 649-2555 Roslyn, WA 98941 Email: custserv@inlandnet.com Supplemental Security Income (SSI) Head Start (Income eligible) Medicaid Income Eligibility (See above Income Eligibility) SUBSCRIBER CERTIFICATION It is understood that by participating in the Lifeline program, the support that I receive is not actual payment to me but a discount on my monthly billed service. Participating in Lifeline does not protect me from collection procedures if I do not pay my phone bill. I fully understand that this discount, as well as the criteria for participation in the Lifeline Program, may change and I may no longer qualify, or the amount of support may increase or decrease. As the Certifying Subscriber, I certify that, (i) the service is for me and not a member of the household; (ii) I am not listed as a dependent on someone else's tax return; and, (iii) the service address is my primary residence. I further certify that the service that I receive from Inland Telephone Company is my main line of service and neither I nor anyone in my household receives Lifeline Support for any other telecommunications service. Further, I understand that Lifeline is a federal benefit program that provides a monthly discount on either home or mobile telephone service and ONLY ONE Lifeline discount is allowed per household. Members of a household are not permitted to receive Lifeline Support from multiple telecommunications providers. I understand that violation of the one-per-household requirement will result in de-enrollment from the program and possible fines and imprisonment. As the Certifying Subscriber claiming income eligibility, I certify that the documentation I have provided accurately represents: (i) my household income and the number of persons in my household; or, (ii) proof of participation in an eligible program. I certify that I will notify Inland Telephone Company within 30 days,(i) if for any reason I should no longer participate in any of the eligible programs or qualify by income, and or (ii) if I move from the address provided on this form. If my address listed above is temporary, I certify that I will verify my address to Inland Telephone Company every 90 days. I understand that if I fail to respond to an attempt to verify my address within 30 days, my Lifeline support may be terminated. I understand that if I fail to give notice as required, I am subject to penalties, including de-enrollment, being barred from the program and fines and imprisonment. I understand that Lifeline Support is not transferrable and that I may not transfer my service to any individual, including another eligible Lifeline Support recipient. I further understand that if my service goes unused for 60 days, my service will be suspended subject to a 30 day period in which I may use the service or contact Inland Telephone Company to confirm that I want to continue receiving the service. Further, I fully understand that in order to continue to receive this support, I must annually, or more often, certify my eligibility and provide proof of eligibility. I understand that my failure to timely re-certify will result in de-enrollment and termination of my Lifeline benefits.

I certify that the information provided on this form is true and correct to the best of my knowledge under penalty of perjury and if I have provded any misleading statements in order to receive support, I will be liable for any support received, my service may be discontinued, it may result in deenrollment and my being barred from the program and I would be subject to state and federal fines and imprisonment.

I fully understand that the Lifeline Program is administered by the Universal Service Administration Company (USAC) under the guidance and authority of the Federal Communications Commission (FCC) and that all of the information that I have supplied pertaining to my eligibility will be shared with

SIGNATURE OF APPLICANT	DATE	
APPLICANT (PRINTED)		

Inland Telephone Company will keep the information contained in this form confidential, except as required by federal or state law. ALL INFORMATION COMPLETED ON THIS FORM IS SUBJECT TO STATE AND FEDERAL PERJURY PENALTIES.

USAC and the FCC and I give my consent to do so.

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LIFELINE HOUSEHOLD WORKSHEET

Your household is everyone who lives together at your address as one economic unit (including children and people who are not related to you).

The adults you live with are part of your economic unit if they contribute to and share in the income and expenses of the household. An adult is any person 18 years of age or older, or an emancipated minor (a person under age 18 who is legally considered to be an adult). Household expenses include food, health care expenses (such as medical bills) and the cost of renting or paying a mortgage on your place of residence (a house or apartment, for example) and utilities (including water, heat and electricity). Income includes salary, public assistance benefits, social security payments, pensions, unemployment compensation, veteran's benefits, inheritances, alimony, child support payments, worker's compensation benefits, gifts, and lottery winnings

Spouses and domestic partners are considered to be part of the same household. Children under the age of 18 living with their parents or guardians are considered to be part of the same household as their parents or guardians. If an adult has no income, or minimal income, and lives with someone who provides financial support to that adult, both people are considered part of the same household.

You have been asked to complete this Worksheet because someone else may currently receive a Lifeline-supported service at your address. This other person may or may not be a part of your household. Answer the questions below to determine whether there is more than one household residing at your address.

1)			domestic partner (that is, someone y		to or in a relationship	p with) already receive a	a Lifeline-discounted
	ph	none? (check NO if	you do not have a spouse or partner)	VEC	No		
				LYES			
	SS 3330 /-	you checked YES , yo er household.	u may not sign up for Lifeline because so	meone in your h	ousehold already receiv	ves Lifeline. Only ONE Life	eline discount is allowed
	48		ase answer question #2.				
2)			or partner, do other adults (people o	ver the age of 1	8 or emancipated mi	nors) live with you at yo	our address?
	A.	A parent		YES	NO		
	В.	An adult s	on or daughter	YES	NO		
	C.		dult relative (such as a sibling, aunt, andparent, grandchild, etc)	YES	NO		
	D.	An adult r	pommate	YES	NO		
	E.	Other	- 1.27	YES	NO		
		you checked NO for orksheet.	each statement above, you do not need t	o answer the re	maining questions. Ple	ase initial line B, below, a	nd sign and date the
	> If y	ou checked YES, ple	ase answer question #3.				
3)			xpenses (bills, food, etc.) and share in	_ 89	our income, the other	r person's income or bot	th incomes together)
	wi	th at least one of t	he adults listed above in question #2?				
				YES	NO		*
	> If y	ou checked NO , the	n your address includes more than one h	nousehold. Plea	se initial lines A and B	below, and sign and date	the worksheet.
		you checked YES, the ceives Lifeline.	n your address includes only one housel	hold. You may n	ot sign up for Lifeline b	pecause someone in your h	nousehold already
CEDT	TEIC	ATION					
			elow and sign and date this workshee	et which must a	ccompany your Lifelii	ne application.	
А		I certify tha	t I live at an address occupied by multiple	households.			
В	. 🗖	l understan	d that violation of the one-per-household	requirement is a	gainst the Federal Con	nmunications Commission	's rules and may result
	_		my Lifeline benefits, and potentially, pro				
SIGNAT	URF O	OF APPLICANT				DATE	
	,, 0			35270	77 il. 12-38		DECEMBER 2
APPLIC	ANT (P	PRINTED)	<u> </u>				

INLAND TELEPHONE COMPANY

103 S. 2ND Street P.O. Box 171 Roslyn, WA 98941 (509) 649-2211; (800) 462-4578 Fax: (509) 649-2555 Email: custserv@inlandnet.com

ACCEPTABLE DOCUMENTATION REQUIRED FOR LIFELINE INCOME ELIGIBILITY

When requesting Lifeline based on income eligibility (i.e., the consumer's household income is at or below 135% of the Federal Poverty Guidelines), the consumer must provide documentation of income eligibility at the time of enrollment. Any one of the following documents is acceptable to be used to verify income eligibility for Lifeline:

- > The prior year's Federal Tax Return; or
- > The prior year's State Tax Return; or
- > The prior year's Tribal Tax Return; or
- > Three consecutive months' worth of income statements from an employer or paycheck stubs within the current calendar year; or
- > Divorce Decree documenting income; or
- > Child Support Document documenting income; or
- > Social Security Statement of Benefits; or
- > Veterans Administration Statement of Benefits; or
- > An Unemployment/Worker's Compensation Statement of Benefits; or
- > Federal or Tribal Notice Letter of Participation in General Assistance.

If the consumer presents documentation of income that does not cover a full year, such as current pay stubs, the consumer must present three consecutive months' worth of the same types of document within the calendar year.

Annual Lifeline Eligible Telecommunications Carrier Certification Form

All carriers must complete all or portions of all sections

Form must be submitted to USAC and filed with the Federal Communications Commission

IMPORTANT: PLEASE READ INSTRUCTIONS FIRST

Deadline: January 31st (Annually)

522423		
Study Area Code (SAC)		
	certification form for each SAC through which it provides Lifeline service).	
Washington	Inland Telephone Company	
State	ETC Name	
Inland Networks	Western Elite Incorporated Services	
DBA, Marketing or Other Branding Name (If same as ETC name, list "N/A" Do not leave blank)	Holding Company Name (If same as ETC name, list "N/A" Do not leave blank)	
Does the reporting company have affiliated ETCs?	Yes 🗸 No 🗔	
determined in accordance with Section 3(2) of the Communications	T, using page 4 and additional sheets if necessary. Affiliation shall be a Act. That Section defines "affiliate" as "a person that (directly or indirectly) wnership or control with, another person." 47 U.S.C. § 153(2). See also 47	
Affiliated ETC's SAC	Affiliated ETC's Name	
See list of Affiliated ETC's	See list of Affiliated ETC's	
	The state of the s	

For purposes of this filing, an officer is an occupant of a position listed in the article of incorporation, articles of formation, or other similar legal document. An officer is a person who occupies a position specified in the corporate bylaws (or partnership agreement), and would typically be president, vice president for operations, vice president for finance, comptroller, treasurer, or a comparable position. If the filer is a sole proprietorship, the owner must sign the certification.

Section 1: Initial Certification All ETCs must complete this section

I certify that the company listed above has certification procedures in place to:

- A) Review income and program-based eligibility documentation prior to enrolling a consumer in the Lifeline program, and that, to the best of my knowledge, the company was presented with documentation of each consumer's household income and/or program-based eligibility prior to his or her enrollment in Lifeline; and/or
- B) Confirm consumer eligibility by relying upon access to a state database and/or notice of eligibility from the state Lifeline administrator prior to enrolling a consumer in the Lifeline program.

I am an officer of the company named above. I am authorized to make this certification for the Study Area Code listed above.

Initial

Section 2: Annual Recertification

Do not leave empty blocks. If an ETC has nothing to report in a block, enter a zero.

A	В	С	D	E = (A - B - C - D)
Number of subscribers claimed on February FCC Form 497 of current Form 555 calendar year (February data month)	Number of lines claimed on February FCC Form 497 of current Form 555 calendar year provided to wireline resellers	Number of subscribers claimed on the February FCC Form 497 that were initially enrolled in the current Form 555 calendar year (These subscribers did not have Lifeline service prior to January 1 of the current 555 calendar year.)	Number of subscribers de-enrolled <u>prior</u> to recertification attempt by either the ETC, a state administrator, access to an eligibility database, or by USAC	Number of subscribers ETC is responsible for recertifying for current Form 555 calendar year
31	0	10	0	21

Recertification Results:

F	G	$\mathbf{H} = (\mathbf{F} \mathbf{-} \mathbf{G})$	I	J = (H+1)
Number of subscribers ETC contacted directly to recertify eligibility through attestation	Number of subscribers responding to ETC contact	Number of non- responding subscribers	Number of subscribers responding that they are no longer eligible (This should be a subset of Block G.)	Number of subscribers de- enrolled or scheduled to be de-enrolled as a result of non-response or response of ineligibility from ETC recertification attempt
21	21	0	0	0

K	L
Number of subscribers whose eligibility was reviewed by state administrator, ETC access to eligibility database, or by USAC	Number of subscribers de-enrolled or scheduled to be de-enrolled as a result of finding of ineligibility by state administrator, ETC access to eligibility database, or USAC
0	0

Note: If any subscriber was reviewed by an ETC accessing a state database or by a state administrator and subsequently contacted directly by the ETC in an attempt to recertify eligibility, those subscribers should be listed in Blocks F through J as appropriate and not in Blocks K and L. As a result, all subscribers subject to recertification who were not de-enrolled prior to the recertification attempt must be accounted for in Block F or Block K.

The total of Block F and Block K should equal the number reported in Block F

Certification:

Based on the data entered above, initial the certification(s) below that apply. Both Certification A and B may apply depending on the recertification procedures in place for the SAC reporting on this form. If Certification C applies, neither Certification A nor B may apply.

A.) I certify that the company listed above has procedures in place to recertify the continued eligibility of all of its Lifeline subscribers, and that, to the best of my knowledge, the company obtained signed certifications from all subscribers attesting to their continuing eligibility for Lifeline. Results are provided in the chart above in Blocks F through J. I am an officer of the company named above. I am authorized to make this certification for the SAC listed above.
Initial

AND/OR

B.) I certify that the company listed above has procedures in place to recertify consumer eligibility by relying on:

USAC NLAD

Results are provided in the chart above in Blocks K through L. I am an officer of the company named above. I am authorized to make this certification for the SAC listed above.

C.) I certify that my company did not claim federal low income support for any Lifeline subscribers for the February Form 497 data month for the current Form 555 calendar year. I am an officer of the company named above. I am authorized to make this certification for the SAC listed above.

Initial _____

InitiaL

Section 3: De-enroll Percentage

Using the data entered in Section 2, complete the chart below to find the percentage of subscribers de-enrolled for this ETC.

$\mathbf{M} = (\mathbf{F} + \mathbf{K})$	N = (J+L)	$O = ((N \div M) \div 100)$
Number of subscribers that the ETC attempted to recertify directly or through a state administrator, ETC access to a state database, or by USAC (This should equal the number reported in Block E)	Number of subscribers de- enrolled or scheduled to be de- enrolled as a result of non-response or ineligibility	Percentage of subscribers de-enrolled or scheduled to be de-enrolled as a result of ineligibility or non-response
21	0	0.00

Section 4: Pre-Paid ETCs

All ETCs must complete the appropriate check-box; pre-paid ETCs must complete all of Section 4. Pre-paid ETCs generally do not assess or collect a monthly fee from their Lifeline subscribers. ETCs that only assess a fee but do not collect such fees are pre-paid ETCs and must complete the chart below.

Is the	FTC	Pre-Paid?	

1/	1
YES	

No 🗸

If Yes, record the number of subscribers de-enrolled for non-usage by month in Block Q below.

P	Q
Month	Subscribers De-Enrolled for Non-Usage
January	
February	
March	
April	
May	
June	
July	4
August	
September	
October	
November	
December	
Total Subscribers	

Signature Block

By signing	below,	Ic	ertify 1	that th	e company	listed	above	is ir	cor	npliance	with	all fe	ederal	Lifeline	certi	fication
procedures.	Iam	an	office	r of th	e company	name	d abo	ve.	am	authori	zed to	mal-	ce this	certific	ation	for the
Study Area	Code (SA	C) list	ed abo	ve.											

Signed

Signature of Officer

jbrooks@inlandnet.com

Email Address of Officer

James K. Brooks

Person Completing This Certification Form

James K. Brooks, Treasurer

Printed Name and Title of Officer

January 21, 2016

Date

(509) 649-2211

Contact Phone Number

Affiliated ETCs

SAC	Name
472423	Inland Telephone Company (d/b/a Inland Networks)
479007	Inland Cellular LLC (d/b/a Inland Cellular)
529003	Inland Cellular LLC (d/b/a Inland Cellular)
529004	Inland Cellular LLC (d/b/a Inland Cellular)
	The state of the s
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Broadband Milestone Certification §54.313(f)(1)(i)

Rate-of-Return ETCs are required to provide certain certifications and other details related to their broadband obligations.

I, James K. Brooks, being of lawful age, state that I am Treasurer/Controller of Inland Telephone Company ("Company"), Study Area Code 522423, that I am authorized to execute this certification on behalf of the Company, and that the facts set forth in this certification are true to the best of my knowledge, information and belief.

On this basis, the Company certifies, pursuant to 47 C.F.R. § 54.313(f)(1)(i), that it has taken reasonable steps to provide upon reasonable request, broadband service at actual speeds of 4 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 reasonably comparable offerings in urban areas, and that requests for such service are met within a reasonable amount of time.

The Company is currently offing a maximum service offering of 100 Mbps downstream/50 Mbps upstream in its Roslyn exchange and a maximum service offering of 10 Mbps downstream/1 Mbps upstream in its Dewatto, Prescott and Uniontown exchanges. The Company is in the planning stage for achieving a standard of 25 Mbps downstream/3 Mbps upstream in these three exchanges.

I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Dated this 28th day of June, 2016 at Roslyn, Washington.

James K. Brooks

Treasurer/Controller

According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB cuntrol number. The valid OMB cuntrol number for this information collection is 0572-0031. The time required to complete this information collection is estimated to average 4 hours per response, including the time for reviewing instructions.

searching existing data sources, gathering and maintaining	ng the data needed, and cor	npleting and reviewing	the collection of information.	300				
USDA-R	US		This data will be used by RUS to review your financial situation. Your response is required by 7 U.S.C. 901 et seq.					
			and, subject to federal laws and regulations regarding confidential information, will be treated as confidential. BORROWER NAME					
NO CONSISTENCE AND A SECOND PROPERTY AND A S			BORROWER NAME					
OPERATING RE		S	Inland Telephone Company					
			(Prepared with Audited Data)					
INSTRUCTIONS-Submit report to RUS within 30 c	lays after close of the pe	eriod.	PERIOD ENDING	BORROWER DESIGNATION	NC			
For detailed instructions, see RUS Bulletin 1744-2	. Report in whole dollar	rs only.	December, 2015	WA0534				
		CI	ERTIFICATION					
to the best of our knowledge and belief ALL INSURANCE REQUIRED BY RENEWALS HAVE BEEN OBTAIL	: 7 CFR PART 1788, NED FOR ALL POI	, CHAPTER XVI LICIES. THIS REPORT	ounts and other records of the system and reflect the sta I, RUS, WAS IN FORCE DURING THE REPORTIF PURSUANT TO PART 1788 OF 7CFR CHAPTER 3 of the following)	NG PERIOD AND				
All of the obligations under the RUS loan d have been fulfilled in all material respects.	ocuments		There has been a default in the fulfillment of the oblig- under the RUS loan documents. Said default(s) is/ar specifically described in the Telecom Operating Repo	e				
		3/28/2016	The American American Control of the					
Gregory Maras	-2	3/28/2016 DATE	-					
			A. BALANCE SHEET					
	BALANCE	BALANCE		BALANCE	BALANCE			
ASSETS	PRIOR YEAR	END OF PERIOD	LIABILITIES AND STOCKHOLDERS' EQUITY	PRIOR YEAR	END OF PERIOD			
CURRENT ASSETS			CURRENT LIABILITIES	872,782	250,669			
Cash and Equivalents	114,840		25. Accounts Payable	0 0	250,003			
Cash-RUS Construction Fund	75,774	344,772	26. Notes Payable		0			
3. Affiliates:	and product of the second	Li (1.00 Lib (3))	27. Advance Billings and Payments	0				
a. Telecom, Accounts Receivable	C		28. Customer Deposits	2,329	2,416			
b. Other Accounts Receivable			29. Current Mat. L/T Debt	448,400	663,400			
c. Notes Receivable	0	0	30. Current Mat. L/T Debl-Rur. Dev.	0	0			
4. Non-Affiliates:			31. Current MatCapital Leases					
a. Telecom, Accounts Receivable	538,193	621,477	32. Income Taxes Accrued	20	0			
b. Other Accounts Receivable	0	0	33. Other Taxes Accrued	98,938	86,445			
c. Notes Receivable	0		34. Other Current Liabilities	356,671	504,041			
5. Interest and Dividends Receivable	0		35. Total Current Liabilities (25 thru 34)	1,779,140	1,506,971			
6. Material-Regulated	241,005		LONG-TERM DEBT	160 166	112,070			
7. Material-Nonregulated	0		36. Funded Debt-RUS Notes	168,166 45,278	22,721			
8. Prepayments	42,366	1970	37. Funded Debt-RTB Notes					
9. Other Current Assets	0		38. Funded Debt-FFB Notes	6,229,991	8,947,295			
10. Total Current Assets (1 Thru 9)	1,012,178	1,568,253	39. Funded Debt-Other	(3,363)	(3,535)			
NONCURRENT ASSETS			40. Funded Debt-Rural Develop. Loan	0	0			
11. Investment in Affiliated Companies	de la companya		41. Premium (Discount) on L/T Debt	0	0			
a. Rural Development	733,101		42. Reacquired Debt		0			
b. Nonrural Development	0		43. Obligations Under Capital Lease	0				
12. Other Investments			44. Adv. From Affillated Companies		0			
a. Rural Development	0	tr. Assessment and Control	45. Other Long-Term Debt	0	0			
b. Nonrural Development	201,491		46. Total Long-Term Debt (36 thru 45)	6,440,072	9,078,551			
13. Nonregulated Investments	1,606,179		OTHER LIAB. & DEF. CREDITS	o	0			
14. Other Noncurrent Assets	250		47. Other Long-Term Liabilities		- 100			
15. Deferred Charges	0		48. Other Deferred Credits	578,942 0	1,011,744			
16. Jurisdictional Differences	0		49. Other Jurisdictional Differences					
17. Total Noncurrent Assets (11 thru 16)	2,541,021		50. Total Other Liabilities and Deferred Credits (47 thru 49)	578,942	1,011,744			
PLANT, PROPERTY, AND EQUIPMENT		and the second second	EQUITY		02.352			
18. Telecom, Plant-In-Service	27,004,739		51. Cap. Stock Outstand, & Subscribed	93,150	93,150			
19. Property Held for Future Use	0		52. Additional Paid-in-Capital	7,175	7,175			
20. Plant Under Construction	2,292,893	2.44	53. Treasury Stock	0	0			
21. Plant Adj., Nonop. Plant & Goodwill	0	0	54. Membership and Cap. Certificates	0	0			

55. Other Capital

57. Retained Earnings or Margins

59. TOTAL LIABILITIES AND EQUITY (35+46+50+58)

58. Total Equity (51 thru 57)

18,905,314

11,451,149 13,880,756 56. Patronage Capital Credits

17,846,483

15,004,348 17,702,152

22. Less Accumulated Depreciation

23. Not Plant (18 thru 21 loss 22)

24. TOTAL ASSETS (10+17+23)

6,004,561

6,104,886

0

0

0

15,004,348 17,702,152

6,105,869

6,206,194

OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS

BORROWER DESIGNATION

WA0534

PERIOD ENDING

December, 2015

INSTRUCTIONS- See RUS Bulletin 1744-2

PART B. STATEMENTS OF INCOME AND RETAINED EARNINGS OR MARGINS

PART B. STATEMENTS OF INCOME AND RETAINED EARLINGS ON MARCHINE				
ITEM	PRIOR YEAR	THIS YEAR		
Local Network Services Revenues	675,461	684,380		
2. Network Access Services Revenues	4,179,688	4,170,260		
Long Distance Network Services Revenues	(1,216)	(449)		
Carrier Billing and Collection Revenues	51,445	49,928		
5. Miscellaneous Revenues	70,664	36,574		
6. Uncollectible Revenues	7,139	157		
7. Net Operating Revenues (1 thru 5 less 6)	4,968,903	4,940,536		
8. Plant Specific Operations Expense	1,762,438	1,592,338		
9. Plant Nonspecific Operations Expense (Excluding Depreciation & Amortization)	396,535	471,850		
10. Depreciation Expense	1,346,798	1,294,047		
11. Amortization Expense	182	182		
12. Customer Operations Expense	595,029	539,664		
13. Corporate Operations Expense	951,200	1,001,800		
14. Total Operating Expenses (8 thru 13)	5,052,182	4,899,881		
15. Operating Income or Margins (7 less 14)	(83,279)	40,655		
16. Other Operating Income and Expenses	1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 -	0		
17. State and Local Taxes	139,873	142,942		
18. Federal Income Taxes	(120,071)	(38,430)		
19. Other Taxes	0			
20. Total Operating Taxes (17+18+19)	19,802	104,512		
21. Net Operating Income or Margins (15+16-20)	(103,081)	(63,857)		
22. Interest on Funded Debt	144,819	214,726		
23. Interest Expense - Capital Leases	0	0		
24. Other Interest Expense	10,098	191		
25. Allowance for Funds Used During Construction	30,457	67,703		
26. Total Fixed Charges (22+23+24-25)	124,460	147,214		
27. Nonoperating Net Income	(2,287)	11,931		
28. Extraordinary Items		0		
29. Jurisdictional Differences		Ō		
30. Nonregulated Net Income	348,954	98,148		
31. Total Net Income or Margins (21+27+28+29+30-26)	119,126	(100,992)		
32. Total Taxes Based on Income	51,562			
33. Retained Earnings or Margins Beginning-of-Year	5,988,074	6,105,869		
34. Miscellaneous Credits Year-to-Date		0		
35. Dividends Declared (Common)		0		
36. Dividends Declared (Preferred)		0		
37. Other Debits Year-to-Date	1,331	316		
38. Transfers to Patronage Capital		0		
39. Retained Earnings or Margins End-of-Period [(31+33+34) - (35+36+37+38)]	6,105,869	6,004,561		
40. Patronage Capital Beginning-of-Year		0		
41. Transfers to Patronage Capital		0		
42. Patronage Capital Credits Retired		0		
43. Patronage Capital End-of-Year (40+41-42)	0	0		
44. Annual Debt Service Payments	643,649	740,499		
45. Cash Ralio [(14+20-10-11) / 7]	0.7497	0.7510		
46. Operating Accrual Ratio [(14+20+26) / 7]	1.0458	1.0427		
47. TIER [(31+26) / 26]	1.9571	0.3140		
48. DSCR [(31+26+10+11) / 44]	2,4712	1.8102		
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INSTRUCTIONS - See RUS Bulletin 1744-2

	Part C. SUI	SCRIBER (ACC	ESS LINE), ROUTE N	HILE, & HIGH SPEED	DATA INFORM	IATION	
	1. RATE	s I	2. SUBSC	RIBERS (ACCESS LINES	3. ROUTE MILES		
EXCHANGE	B-1 (a)	R-1 (b)	BUSINESS (a)	RESIDENTIAL (b)	TOTAL (c)	TOTAL (including fiber) (a)	FIBER (b)
DEWATTO	27.00	22.00	19	294	313	144.25	40.07
PRESCOTT	26.50	16.50	40	108	148	198.31	43.37
ROSLYN	24.00	16.00	194	1,063	1.257	157.68	34.06
UNIONTOWN	25.00	16.00	216	290	506	258.96	64.17
LEON	40.68	25.76	1	27	28	20.37	13.14
LENORE	40.68	25.76	21	229	250	178.34	12.00
MobileWireless					0		
Route Mileage Outside Exchange Area					•	18.07	18.07
Total			491	2,011	2,502	975.98	224.88
No. Exchanges	6						

OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS

BORROWER DESIGNATION

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Part C. SUBSCRIBER (ACCES	S LINE), ROUTE M	ILE, & HIGH SPEED DATA	INFORMATION

4. BROADBAND SERVICE Details on Least Expensive Broadband Service Type Of Technology Advertised Download Rate (Kbps) (d) Advertised Upload Rate (Kbps) (e) Price Per Month Standalone/Pckg No. Access Lines with BB available (a) Number Of Subscribers No Of Broadband Subscribers **EXCHANGE** DSL 39.95 Package 313 230 50 768 512 DEWATTO 39.95 Package DSL 22 768 512 PRESCOTT 148 63 977 570 6,000 1,500 49.95 Package DSL 1,257 ROSLYN DSL 49.95 Package UNIONTOWN 505 233 176 6,000 1,500 49.95 Package DSL 1,500 13 6,000 LEON 28 19 99 768 512 39.95 Package DSL 134 LENORE 250 2,502 1,656 Total

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	USDA-RUS					BORROWER DESIGNATION			
	OPERATING REPORT FOR	₹		WA0534		No. 11 11 11 11 11 11 11 11 11 11 11 11 11			
TE	ELECOMMUNICATIONS BORRO			PERIOD ENDING December, 2					
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INSTRUCTIONS- See RUS Bulletin 1	1744-2								
		PART D. SYSTEM	I DATA						
I, No. Plant Employees	2. No. Other Employees	3. Square Miles Served	463	4. Access Lines per Squa	re Mile 5 . 40	5. Subscribers per Route Mile 2.56			
		PART E. TOLL	DATA						
1. Study Area ID Code(s)	2. Types of Toll Se	ittlements (Check one	W 80 80 80	П		V			
a.:	472423		Interstate:	Average Schedul	е	X Cost Basis			
b.	522423			П		V			
C.			Infrastate:	Average Schedul	е	X Cost Basis			
d.									
e.									
f									
				•					
h.				90 9 0					
L.									
١.									
	PART F. FU	NDS INVESTED IN P	LANT DURING YE	AR					
1. RUS, RTB, & FFB Loan Funds Exp	pended			-		3,379,252			
2. Other Long-Term Loan Funds Exp	ended				transmitter of				
3. Funds Expended Under RUS Interi									
4. Other Short-Term Loan Funds Exp									
5. General Funds Expended (Other th						801,781			
6. Salvaged Materials									
7. Contribution in Aid to Construction		No. of the least o							
8. Gross Additions to Telecom. Plant	(1 thru 7)					4,181,033			
	PART G. INV	ESTMENTS IN AFF	LIATED COMPANI	ES					
		CURRENT Y	EAR DATA		CUMULATIVE DA	ATA			
		Guillatt 1		Cumulative	Cumulative				
nn/ec	TMENTS	Investment	Income/Loss	Investment	Income/Loss	Current			
INVES	I III LI II I	This Year	This Year	To Date	To Date	Balance			
3	(a)	(b)	(r)	(d)	(c)	Ø			
Investment in Affiliated Companies	c - Rumi Davelonment	(249,021)	126	484,080		484,080			
Investment in Affiliated Companies Investment in Affiliated Companies									

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OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS

BORROWER I	DESIGNATION		
PERIOD ENDI	NG		
December,	2015		

PART H. CURRENT DEPRECIATION RATES

Are corporation's depreciation rates approved by the regulatory authority with jurisdiction over the provision of telephone services? (Check one)	X YES NO

EQUIPMENT CATEGORY	DEPRECIATION RATE
Land and support assets - Motor Vehicles	16.00%
Land and support assets - Aircraft	
Land and support assets - Special purpose vehicles	
Land and support assets - Garage and other work equipment	16.00%
5. Land and support assets - Buildings	4.00%
Land and support assets - Furniture and Office equipment	15.00%
Land and support assets - General purpose computers	25.00%
8. Central Office Switching - Digital	9.00%
Central Office Switching - Analog & Electro-mechanical	•
10. Central Office Switching - Operator Systems	
11. Central Office Transmission - Radio Systems	13.00%
12. Central Office Transmission - Circuit equipment	11.19%
13. Information origination/termination - Station apparatus	
14. Information origination/termination - Customer premises wiring	
15. Information origination/termination - Large private branch exchanges	
16. Information origination/termination - Public telephone terminal equipment	
17. Information origination/termination - Other terminal equipment	
18. Cable and wire facilities - Poles	7.59%
19. Cable and wire facilities - Aerial cable - Metal	42.06%
20. Cable and wire facilities - Aerial cable - Fiber	5.00%
21. Cable and wire facilities - Underground cable - Metal	6.00%
22. Cable and wire facilities - Underground cable - Fiber	5.00%
23. Cable and wire facilities - Buried cable - Metal	
24. Cable and wire facilities - Burled cable - Fiber	
25. Cable and wire facilities - Conduit systems	
26. Cable and wire facilities - Other	

BORROWER DESIGNATION

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OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS

30.

Ending Cash

PERIOD ENDED

	TELECOMMONIOATIONO DOMINOVERO	December, 2015	
INSTRUCTIONS – See help in the online application. FART I – STATEMENT OF CASH FLOWS			
	FART I – STATEMENT C	F CASH FLOWS	
1.	Beginning Cash (Cash and Equivalents plus RUS Construction Fund)		190,61
2000	CASH FLOWS FROM OPERATING ACTI	VITIES	
2.	Net Income		(100,992
	Adjustments to Reconcile Net Income to Net Cash Provided	l by Operating Activities	
3.	Add: Depreciation		1,294,04
4.	Add: Amortization		18
5.	Other (Explain) See Notes Section		463,52
	Changes in Operating Assets and Liabili	ilies	
6.	Decrease/(Increase) in Accounts Receivable	•	(83,284
7.	Decrease/(Increase) in Materials and Inventory	•	(1,744
8.	Decrease/(Increase) in Prepayments and Deferred Charges		(34,728
9.	Decrease/(Increase) in Other Current Assets		
10.	Increase/(Decrease) in Accounts Payable		(622,113
11.	Increase/(Decrease) in Advance Billings & Payments		
12.	Increase/(Decrease) in Other Current Liabilities	V 40-100 170 00 00 00 00 00 00 00 00 00 00 00 00 0	134,85
13.	Net Cash Provided/(Used) by Operations		1,049,74
	CASH FLOWS FROM FINANCING ACTIV	TITIES	
14.	Decrease/(Increase) in Notes Receivable		
15.	Increase/(Decrease) in Notes Payable		
16.	Increase/(Decrease) in Customer Deposits		81
17.	Net Increase/(Decrease) in Long Term Debt (Including Current Maturities)		2,853,479
18.	Increase/(Decrease) in Other Liabilities & Deferred Credits		432,80
19.	Increase/(Decrease) in Capital Stock, Pald-in Capital, Membership and Capital Ce	rtificates & Other Capital	
20.	Less: Payment of Dividends		(
21.	Less: Patronage Capital Credits Retired		
22.	Other (Explain) See Notes Section		(432,889)
23.	Net Cash Provided/(Used) by Financing Activities		2,853,479
	CASH FLOWS FROM INVESTING ACTIVI	TIES	
24.	Net Capital Expenditures (Property, Plant & Equipment)		(3,488,438)
25.	Other Long-Term Investments		287,878
26.	Other Noncurrent Assets & Jurisdictional Differences		C
27.	Other (Explain) See Notes Section		(266,346)
28.	Net Cash Provided/(Used) by Investing Activities		(3,466,906)
29.	Net Increase/(Decrease) in Cash		436,319
20	E-V Ob		626 933

Revision Date 2010

626,933

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NOTES TO THE OPERATING RE	PORT FOR TELECOMMUNICATIONS BORROWERS
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NOTES TO THE OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS

PART I-STATEMENT OF CASH FLOWS

CASH FLOW RECONCILING EXPLANATIONS

DESCRIPTION

AMOUNT

Line 5-Other

Increase in CSV (7,394.00)

Depreciation on Nonregulated Investments 119,533.00

Deferred FIT (38,430.00)

Noncash Stock Dividend (9,579.00)

Plant in Accounts Payable 399,284.00

Operating Change in Customer Deposits 87.00

Noncash Transfer State Income Taxes 20.00

463,521.00

Line 22-Other

Deferred FIT on Investments 163.00

Noncash Transfer of Deferred FIT (471,395.00)

Operating Change in Customer Deposits (87.00)

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Current Operating Deferred FIT	38,430.00
	(432,889.00)
Line 27-Other	
Retirement/Transfers in Net Plant and	
Nonregulated Investments	(235,714.00)
Operating Cashflow-Long Term	
Invesements	16,953.00
Operating Depreciation On Nonregulated	
Investments	(119,533.00)
Plant in Accounts Payable	(399,284.00)
Noncash Transfer of Deferred FIT	
Tolicasii Italisici oi pelelieu i II	471,395.00
Deferred FIT on Investments	(163.00)
√	(266,346.00)

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CERTIFICATION LOAN DEFAULT NOTES TO THE O	PERATING REPORT FOR TELECOMMUNICATIONS BORROWERS