

EXHIBIT 3

DEMONSTRATION OF RISK OF RATE INSTABILITY OR SERVICE INTERRUPTION OR CESSATION

The operating environment in which the Company finds itself is one of great financial uncertainty. In large part, this financial uncertainty stems from the Transformation Order issued by the Federal Communications Commission.¹ The Transformation Order has built in an automatic decline in the Company's intrastate and interstate access revenues. The intercarrier compensation portion of the Transformation Order introduces a concept of a base line year for calculating revenues and provides support from the Connect America Fund ("CAF") based on the base line year. However, the base line year revenues (i.e. CAF support) are reduced by five percent each year. The Company had been exploring ways of addressing access bypass to increase access revenues. However, any increase in access revenues under the Transformation Order would simply be a reduction in CAF support and no new net revenues would be produced. The CAF support reduction began July 2012. Projecting through the calendar year 2016, including additional reductions that will occur July 1, 2016, the Company has seen a reduction in support from the base line revenue amount of approximately \$ 182,000.

In addition, by order of this Commission, the traditional universal service access rate element and related pooling fund have been terminated effective July 1, 2014. Using 2012 as a base line, which is the latest year with final pool numbers, the Company is facing a loss of traditional universal service fund revenues of approximately \$115,181.00 per year.

In addition, the Company has seen some migration of customers "cutting the cord" to move to wireless or other service as their sole method of telecommunications. Further, in moving to the federal urban rate floor, the Company has seen an accelerated pace of customers giving up their land line telephone service subscribership. A loss of customers easily equates to a loss of revenue without a corresponding reduction in expenses. The company has seen a net loss of 1.9% of our customer base since 2013. Most of these customers disconnected land-line service in favor of wireless and indicated cost as a major factor.

In addition, the FCC has recently released information on a "Forward Looking Cost Model" methodology which would calculate total USF and High Cost support know as ACAM. Although the FCC purports to include real world data as the basis of the models calculations, and the FCC indicates companies that deploy fiber should fare better than those that do not, our company

¹ *In the Matter of Connect America Fund, A National Broadband Plan for Our Future, Establishing Just and Reasonable Rates for Local Exchange Carriers, High-Cost Universal Service Support, Developing an Unified Intercarrier Compensation Regime, Federal-State Joint Board on Universal Service, Lifeline and Link-Up, Universal Service Reform - Mobility Fun*, WC Docket No. 10-90, GN Docket No. 09-51, WC Docket No. 07-135, WC Docket No. 05-337, CC Docket No. 01-92, CC Docket No. 96-45, WC Docket No. 03-109, WT Docket No. 10-208, Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161 (rel. Nov. 18, 2011)(*USF/ICC Transformation Order*).

would see a 75% decrease in annual USF and HCLS support should this model be adopted. The company's total USF and HCLS support for 2014 was \$1,976,315.00 under the ACAM model total support for 2015 would be reduced to only \$505,998.00. The FCC has presented ACAM as a voluntary model that companies can "opt in" however, the FCC has clearly indicated companies that choose not to participate in the ACAM model are likely to fare worse than those that do when the FCC finalizes USF reform. Chairman Wheeler has ambitious plans for the ACAM model and is pressing for implementation by year-end. NTCA, WTA don't expect the ACAM model to take effect until sometime in 2016.

The Company has based its ability to secure and service debt based on USF rules at the time the debt was secured. Even a small reduction in USF may put the company at risk in its ability to maintain loan commitments provided by the USDA Rural Utility Service Telecom Loan Program.

The combination of factors noted above creates a situation in which, without support from the state universal service communications program, the Company may be faced with a choice of increasing rates further, which may drive more customers away, or cutting service in order to be able to match expenses to revenues. Neither choice presents a viable path for providing good service to customers. The dilemma presented by these choices reflects the risk of rate instability or service interruption or cessation to which the Company is subject.