



221 East Hickory Street PO Box 3248 Mankato, MN 56001-3248

Toll-Free: 866-442-5679  
Phone: 507-387-1151

[www.enventis.com](http://www.enventis.com)  
Nasdaq: ENVE

REDACTED – FOR PUBLIC INSPECTION

VIA OVERNIGHT DELIVERY

July 1, 2014

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

ATTN: WIRELINE COMPETITION BUREAU

Re: Form 481 ETC filing pursuant to 47CFR §§54.313 and 54.422, Mankato Citizens Telephone Company dba Enventis, SAC 361427  
*Connect America Fund Dockets WC 10-90, 11-42 and 14-58*

Dear Ms. Dortch:

Pursuant to 47CFR §§54.313 and 54.422, Mankato Citizens Telephone Company dba Enventis, SAC 361427, is filing its Form 481 High Cost and Low Income Annual Report.

Mankato Citizens Telephone Company dba Enventis seeks confidential treatment under the Protective Order in this proceeding for Section 54.202(a) Service Quality Improvement Plan portion of the 481 filing pursuant to the Request for Confidential Treatment attached to this filing. Pursuant to the Protective Order, one copy of the confidential document and two copies of the redacted version are provided. The Redacted version is also being filed on the Electronic Comment Filing System.

Sincerely,

A handwritten signature in blue ink that reads "Carrie Rice".

Carrie Rice  
Regulatory Affairs Manager  
507-386-3667

ENCLOSURES

Cc: Mr. Charles Tyler, Telecommunications Access Policy Division (2 confidential copies)



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July 1, 2014

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

RE: REQUEST FOR CONFIDENTIAL TREATMENT – *Connect America Fund*, WC Docket No. 10-90; *Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-42

Request that Information Submitted to the Commission be Withheld from Public Inspection Pursuant to 47 CFR §.459 and 5 USC §552(b)(4): Five Year Service Quality Improvement Plan

Dear Ms. Dortch:

In accordance with the annual reporting requirements of 47 CFR §§54.313 and 54.422, Mankato Citizens Telephone Company dba Enventis (“the Company”), Study Area Code 351096, is submitting a completed FCC Form 481 to the Commission via its Electronic Comment Filing System (ECFS) in WC Docket Nos. 10-90 and 11-42. The Company hereby requests confidential treatment of one attachment: The Five Year Service Quality Improvement Plan, which is redacted with this filing. The request for confidential treatment of the five-year plan is being made pursuant to section 0.459 of the Commission’s rules and Exemption 4 of the Freedom of Information Act (FOIA). This attachment contains competitively sensitive data that the 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.

The following information is provided in support of this request:

**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. Specifically, confidential treatment is sought for all information in the five-year plan related to the Company’s existing broadband capabilities and its network investment plans.

**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 Nos. 10-90 and 11-42 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 five-year service quality improvement plan, pursuant to 47 CFR §§54.202(a)(1)(ii) and 54.313(a)(1).

**Explanation of the degree to which information is commercial or financial or contains a trade secret or is privileged:**  
The five-year service quality improvement plan contains granular information on the Company's existing broadband capabilities as well as detailed plans for financial investments in specific geographic areas of its network. This is closely-guarded, privileged information that the Company does not make publicly available.

**CONCLUSION**

For these reasons, pursuant to Sections 0.457 and 0.459 of the Commission's Rules, the Company requests that the portions of Form 481 which have been redacted with relation to Section 54.202(a) 5 - Year Service Quality Improvement Plan be treated as confidential under the Commission's rules and precedent and withheld in their entirety from public inspection, and that any distribution of them within the Commission should be limited to a "need to know" basis. In the event that any person or entity requests access to the documents or seeks to make any or all of them part of the public record, the company requests to be notified immediately so that it can oppose such request or take other action as necessary to safeguard its interests and the interests of consumers.

Respectfully Submitted,



Carrie Rice  
Regulatory Affairs Manager  
507-386-3667

**FCC Form 481 - Carrier Annual Reporting  
Data Collection Form**

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

<010> Study Area Code	361427
<015> Study Area Name	MANKATO-HICKORYTECH
<020> Program Year	2015
<030> Contact Name: Person USAC should contact with questions about this data	Carrie Rice
<035> Contact Telephone Number: Number of the person identified in data line <030>	5073863667 ext.
<039> Contact Email Address: Email of the person identified in data line <030>	carrie.rice@eventis.com

<b>ANNUAL REPORTING FOR ALL CARRIERS</b>	<b>54.313</b>	<b>54.422</b>
	<b>Completion Required</b>	<b>Completion Required</b>

			(check box when complete)	
<100> Service Quality Improvement Reporting	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<200> Outage Reporting (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<210> <input checked="" type="checkbox"/> <-- check box if no outages to report		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<300> Unfulfilled Service Requests (voice)	<input type="text" value="0"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<310> Detail on Attempts (voice)	<div style="border: 1px solid black; height: 40px; width: 100%;"></div> (attach descriptive document)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
<320> Unfulfilled Service Requests (broadband)	<input type="text" value="0"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<330> Detail on Attempts (broadband)	<div style="border: 1px solid black; height: 40px; width: 100%;"></div> (attach descriptive document)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
<400> Number of Complaints per 1,000 customers (voice)				
<410> Fixed	<input type="text" value="0.0"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<420> Mobile	<input type="text" value=""/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<430> Number of Complaints per 1,000 customers (broadband)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<440> Fixed	<input type="text" value="0.0"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<450> Mobile	<input type="text" value="0.0"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<500> Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<510> <div style="border: 1px solid black; padding: 2px;">361427mn510.pdf</div>	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<600> Functionality in Emergency Situations	(check to indicate certification)	<input type="checkbox"/>	<input type="checkbox"/>	
<610> <div style="border: 1px solid black; padding: 2px;">361427mn610.pdf</div>	(attached descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>	
<700> Company Price Offerings (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<710> Company Price Offerings (broadband)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<800> Operating Companies and Affiliates	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<900> Tribal Land Offerings (Y/N)? <input type="radio"/> <input checked="" type="radio"/>	(if yes, complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<1000> Voice Services Rate Comparability	(check to indicate certification)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
<1010> <div style="border: 1px solid black; height: 40px; width: 100%;"></div>	(attach descriptive document)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
<1100> Terrestrial Backhaul (Y/N)? <input checked="" type="radio"/> <input type="radio"/>	(if not, check to indicate certification)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
<1110>	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
<1200> Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	

**Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet**

<i>Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers</i>			
<2000>	(check to indicate certification)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<2005>	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet**

<3000>	(check to indicate certification)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<3005>	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

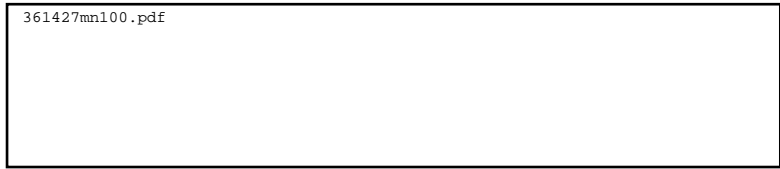
<b>(100) Service Quality Improvement Reporting Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	361427
<015> Study Area Name	MANKATO-HICKORYTECH
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Carrie Rice
<035> Contact Telephone Number - Number of person identified in data line <030>	5073863667 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	carrie.rice@eventis.com

<110> Has your company received its ETC certification from the FCC? If your answer to Line <110> is yes, do you have an existing §54.202(a) "5	(yes / no) <input type="radio"/> <input checked="" type="radio"/>
<111> year plan" filed with the FCC?	(yes / no) <input type="radio"/> <input type="radio"/>

If your answer to Line <111> is yes, then you are required to 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.

<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 check these boxes below 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
- <114> Report how much universal service (USF) support was received
- <115> How (USF) was used to improve service quality
- <116> How (USF) was used to improve service coverage
- <117> How (USF) was used to improve service capacity
- <118> Provide an explanation of network improvement targets not met in the prior calendar year.












**(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	361427
<015>	Study Area Name	MANKATO-HICKORYTECH
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Carrie Rice
<035>	Contact Telephone Number - Number of person identified in data line <030>	5073863667 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	carrie.rice@eventis.com

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

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each 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:

- <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.

Select (Yes, No, NA)

**(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	361427
<015>	Study Area Name	MANKATO-HICKORYTECH
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Carrie Rice
<035>	Contact Telephone Number - Number of person identified in data line <030>	5073863667 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	carrie.rice@eventis.com

<1120> Please check this box to confirm no terrestrial backhaul options exist within the supported area pursuant to § 54.313(G)

<1130> Please check this box 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)

<b>(1200) Terms and Condition for Lifeline Customers</b> <b>Lifeline</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	361427
<015>	Study Area Name	MANKATO-HICKORYTECH
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Carrie Rice
<035>	Contact Telephone Number - Number of person identified in data line <030>	5073863667 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	carrie.rice@enventis.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP <http://www.enventis.com/Support/Residential-Support/Phone-Support/Assistance-Programs.aspx>

“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**

FCC Form 481

**Data Collection Form**

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

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

July 2013

<010>	Study Area Code	361427
<015>	Study Area Name	MANKATO-HICKORYTECH
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Carrie Rice
<035>	Contact Telephone Number - Number of person identified in data line <030>	5073863667 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	carrie.rice@eventis.com

**CHECK the boxes below to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e) the information reported on this form and in the documents attached below is accurate.**

**Incremental Connect America Phase I reporting**

- <2010> 2nd Year Certification {47 CFR § 54.313(b)(1)}
- <2011> 3rd Year Certification {47 CFR § 54.313(b)(2)}

**Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)}**

- <2012> 2013 Frozen Support Certification
- <2013> 2014 Frozen Support Certification
- <2014> 2015 Frozen Support Certification
- <2015> 2016 and future Frozen Support Certification

**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)}**

- <2017> 3rd year Broadband Service Certification
- <2018> 5th year Broadband Service Certification
- <2019> Interim Progress Certification

<2020> Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

<2021> Interim Progress Community Anchor Institutions

Name of Attached Document Listing Required Information

<b>(3000) Rate Of Return Carrier Additional Documentation</b>	FCC Form 481
<b>Data Collection Form</b>	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<b>&lt;010&gt; Study Area Code</b>	361427
<b>&lt;015&gt; Study Area Name</b>	MANKATO-HICKORYTECH
<b>&lt;020&gt; Program Year</b>	2015
<b>&lt;030&gt; Contact Name - Person USAC should contact regarding this data</b>	Carrie Rice
<b>&lt;035&gt; Contact Telephone Number - Number of person identified in data line &lt;030&gt;</b>	5073863667 ext.
<b>&lt;039&gt; Contact Email Address - Email Address of person identified in data line &lt;030&gt;</b>	carrie.rice@eventis.com

**CHECK the boxes below to note compliance on its 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.**

(3010) **Progress Report on 5 Year Plan**  
Milestone Certification (47 CFR § 54.313(f)(1)(i))

Name of Attached Document Listing Required Information

(3011) Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

(3012) Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))

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 document(s), 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) for 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

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

(3021) Management letter 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

<b>Certification - Reporting Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	361427
<015> Study Area Name	MANKATO-HICKORYTECH
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Carrie Rice
<035> Contact Telephone Number - Number of person identified in data line <030>	5073863667 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	carrie.rice@eventis.com

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

<b>Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients</b>	
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:	MANKATO-HICKORYTECH
Signature of Authorized Officer:	CERTIFIED ONLINE <span style="float: right;">Date 07/01/2014</span>
Printed name of Authorized Officer:	Carol Wirsbinski
Title or position of Authorized Officer:	Chief Operating Officer
Telephone number of Authorized Officer:	5073871151 ext.
Study Area Code of Reporting Carrier:	361427 <span style="float: right;">Filing Due Date for this form: 07/01/2014</span>
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.	

<b>Certification - Agent / Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	361427
<015>	Study Area Name	MANKATO-HICKORYTECH
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Carrie Rice
<035>	Contact Telephone Number - Number of person identified in data line <030>	5073863667 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	carrie.rice@eventis.com

**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 or Employee of Agent:	
Signature of Authorized Agent or Employee of Agent:	Date:
Printed name of Authorized Agent or Employee of Agent:	
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







Company Name: Mankato Citizens Telephone Company dba Enventis  
SAC: 361427  
FCC Form 481 Line 100  
Service Quality Improvement Reporting

TRADE SECRET DATA HAS BEEN REDACTED

## **Service Quality Improvement Proposal**

Mankato Citizens Telephone Company ("the Company") serves a single exchange in south central Minnesota: Mankato. Since 2001, pursuant to the Federal Communications Commission's Fourteenth Report and Order, Twenty-Second Order On Reconsideration, and Further Notice Of Proposed Rulemaking in CC Docket No. 96-45, and Report and Order in CC Docket No. 00-256, the Company has annually demonstrated to the Minnesota Public Utilities Commission that its use of the support has been only "only for the provision, maintenance and upgrading of facilities and services for which the support is intended," consistent with section 254(e) of the Telecommunications Act of 1996. The Minnesota Public Utilities Commission has consistently certified to the FCC that the Company has used Universal Service funds for the intended purposes: "... the provision, maintenance and upgrading of facilities and services for which the support is intended." (USC 47 §254(d))

As a recipient of certain high cost and other legacy Universal Service Fund support, the Company understood those monies were to support voice services only. In addition to initial expenditures reported, which were limited to voice, the Company has made significant investments in and deployed broadband via ADSL technologies to virtually all of its service territory.

In the USF/ICC Transformation Order (Connect America Fund et al., Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161 (rel. Nov. 18, 2011), the FCC expanded the list of supported services to include broadband, and ordered all rate of return carriers to develop a five-year plan under which they would respond to reasonable requests for broadband service. The Company has completed a thorough analysis of its study area for

**CONFIDENTIAL FINANCIAL INFORMATION – SUBJECT TO PROTECTIVE  
ORDER IN WC DOCKET NOS. 10-90, 07-135, 05-337, 03-109, CC DOCKET NOS. 01-92, 96-45, GN  
DOCKET NO. 09-51, WT DOCKET NO. 10-208, BEFORE THE FEDERAL COMMUNICATIONS  
COMMISSION.**



broadband expansion based on ADSL technology and its existing copper and fiber facilities. The Broadband Augmentation Plan (“BAP”) submitted herein contains information at the wire center level concerning specific locations where the Company has determined it may reasonably support dollars for the intended purposes. This BAP is independent of the Company’s annual plans for upgrading, maintaining and operating its network. Because the FCC has offered guidance that end user revenues can be considered when evaluating reasonable requests, (Report and Order, Declaratory Ruling, Order, Memorandum Opinion and Order, Seventh Order on Reconsideration, and Further Notice Of Proposed Rulemaking, FCC 14-54, Para. 65, June 11, 2014), the Company will make decisions on where it is prudent to use support dollars for the upgrading and maintenance of its voice and broadband networks.

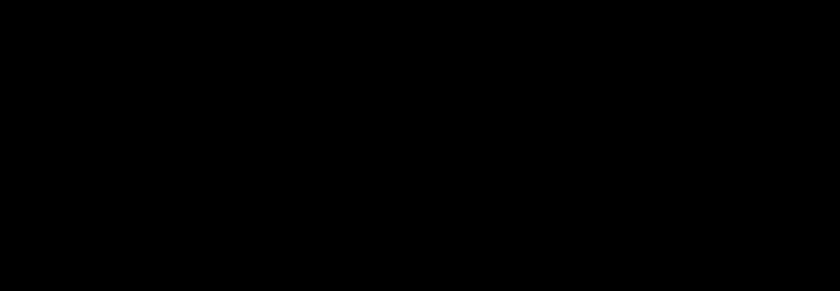
The cost estimates, locations and investment levels included in this Broadband Augmentation Plan are “forward-looking” projections. Such forward-looking projections are based on current expectations, estimates, uniform consumer demand and projections about the industry in which the Company operates. As a result of uncertainties in the forward-looking projections, the Company reserves the opportunity to modify its Plan in response to regulatory decisions, consumer demand, technological advancements and other considerations as they become known. This submission is not a guarantee of future performance and actual outcomes and results may differ materially from what is expressed or forecasted in this forward-looking projection. All material adjustments to the Plan will be reflected and explained in subsequent Form 481 submissions.

**CONFIDENTIAL FINANCIAL INFORMATION – SUBJECT TO PROTECTIVE  
ORDER IN WC DOCKET NOS. 10-90, 07-135, 05-337, 03-109, CC DOCKET NOS. 01-92,  
96-45, GN  
DOCKET NO. 09-51, WT DOCKET NO. 10-208, BEFORE THE FEDERAL COMMUNICATIONS  
COMMISSION.**



**MANKATO CITIZENS TELEPHONE COMPANY BROADBAND AUGMENTATION PROPOSAL**

**[trade secret data begins**

Project #	Designated Build Area by Wire Center	Description	Estimated Households Impacted	Approximate Capital Additions
#1				
#2				
#3				
#4				

**Trade secret data ends]**

**CONFIDENTIAL FINANCIAL INFORMATION – SUBJECT TO PROTECTIVE ORDER IN WC DOCKET NOS. 10-90, 07-135, 05-337, 03-109, CC DOCKET NOS. 01-92, 96-45, GN DOCKET NO. 09-51, WT DOCKET NO. 10-208, BEFORE THE FEDERAL COMMUNICATIONS COMMISSION.**

SAC: 361427

State: MN

Mankato Citizens Telephone Company

Form 481 Line No. 510 Compliance with Service Quality Standards and Consumer Protection

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As required by MN. Rule "7812.0700 Minnesota General Service Quality Requirements. Subpart 1" the local services provided by Mankato Citizens Telephone Company are provided under internal company operating procedures and publically available tariffs which are in compliance with applicable Minnesota Public Utility Commission orders and rules including:

7810.0100 DEFINITIONS.

7810.0200 SCOPE.

7810.0300 STATUTORY AUTHORITY.

**RECORDS AND REPORTS**

7810.0400 RETENTION OF RECORDS.

7810.0500 DATA TO BE FILED WITH THE COMMISSION.

7810.0600 REPORT TO COMMISSION ON SERVICE DISRUPTION.

7810.0900 LOCATION OF RECORDS.

**CUSTOMER RELATIONS**

7810.1000 INFORMATION AVAILABLE TO CUSTOMER AND PUBLIC.

7810.1100 COMPLAINT PROCEDURES.

7810.1200 RECORD OF COMPLAINT.

**CUSTOMER BILLING; DEPOSIT AND GUARANTEE REQUIREMENTS**

7810.1400 CUSTOMER BILLING.

7810.1500 DEPOSIT AND GUARANTEE REQUIREMENTS.

7810.1600 DEPOSIT.

7810.1700 GUARANTEE OF PAYMENT.

**DISCONNECTION OF SERVICE; SERVICE DELAY**

7810.1800 PERMISSIBLE SERVICE DISCONNECTIONS WITH NOTICE.

7810.1900 PERMISSIBLE SERVICE DISCONNECTIONS WITHOUT NOTICE.

7810.2000 NONPERMISSIBLE REASONS TO DISCONNECT SERVICE.

7810.2100 MANNER OF DISCONNECTION.

7810.2200 RECONNECTION OF SERVICE.

7810.2300 NOTICE REQUIREMENTS.

7810.2400 BILL DISPUTES.

7810.2500 ESCROW PAYMENTS.

7810.2600 WAIVING RIGHT TO DISCONNECT; EMERGENCY STATUS.

7810.2800 DELAY IN INITIAL SERVICE OR UPGRADE.

**DIRECTORIES**

7810.2900 CONTENT OF DIRECTORIES.

7810.3000 DIRECTORY ASSISTANCE.

7810.3100 CHANGES OR ERROR OF LISTED NUMBER.

**ENGINEERING**

7810.3200 CONSTRUCTION OF TELEPHONE PLANT.

7810.3300 MAINTENANCE OF PLANT AND EQUIPMENT.

7810.3900 EMERGENCY OPERATIONS.

SAC: 361427

State: MN

Mankato Citizens Telephone Company

Form 481 Line No. 510 Compliance with Service Quality Standards and Consumer Protection

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**INSPECTIONS, TESTS, SERVICE REQUIREMENTS**

7810.4100 ACCESS TO TEST FACILITIES.

7810.4300 ACCURACY REQUIREMENTS.

7810.4900 ADEQUACY OF SERVICE.

7810.5000 UTILITY OBLIGATIONS.

7810.5100 TELEPHONE OPERATORS.

7810.5200 ANSWERING TIME.

7810.5300 DIAL SERVICE REQUIREMENTS.

7810.5400 INTEROFFICE TRUNKS.

7810.5500 TRANSMISSION REQUIREMENTS.

7810.5800 INTERRUPTIONS OF SERVICE.

7810.5900 CUSTOMER TROUBLE REPORTS.

7810.6000 PROTECTIVE MEASURES.

7810.6100 SAFETY PROGRAM.

Mankato Citizens' customer service department has numerous Consumer Protection measures in place to protect customer information from improper use and disclosure, as well as to protect against fraud. For example, Mankato Citizens' has policies and procedures in place regarding Customer Proprietary Network Information (CPNI) and regularly trains employees on same.

Mankato Citizens' is also compliant with the Federal Trade Commission's guidelines to prevent identity theft (the "Red Flag" program).

All employees are trained on the corporation's Code of Conduct, which requires employees to protect sensitive customer information from improper use and disclosure.

Mankato Citizens' and all its affiliates have a Data Privacy and Security policy which applies to all employees.

Mankato Citizens' has implemented a strict third-party qualification protocol to prevent unauthorized charges ("cramming") from appearing on customers' bills.

In addition to the foregoing, Mankato Citizens' has implemented information technology security measures to protect our network and customer information.



SAC: 361427

State: MN

Mankato Citizens Telephone Company

Form 481 Line No. 610 Description of Functionality in Emergency Situations

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Mankato Citizens Telephone Company., pursuant to MN Rule "7810.390 Emergency Operations" has:

- Established reasonable provisions' to meet emergencies resulting from failures of lighting or power service, sudden and prolonged increases in traffic, illness of operators or from fire, storm, or acts of God including provisions for emergency power that meet or exceed the rule requirement to provide:
  - A minimum of four hours of battery service in each central office.
  - A permanently installed power unit in exchanges exceeding 5000 lines.
  - Mobile power units that can be delivered on short notice and which can be readily connected in offices without installed emergency power facilities.
  
- Has informed employees as to the procedures to be followed, including reasonable rerouting of traffic around damaged facilities and the deployment of emergency power, in the event of emergency in order to prevent or mitigate interruption or impairment of telecommunications service.