

Greenbelt, Maryland 20770 phone: 301-459-7590, fax: 301-577-5575 internet: www.jsitel.com, e-mail: jsi@jsitel.com

PUBLIC

July 1, 2014

Via Electronic Filing

Dr. Burl W. Haar Executive Secretary Minnesota Public Utilities Commission 121 Seventh Place E, Suite 350 St. Paul, MN 55101-2147

Re: In the Matter of 2014 ETC Annual Report FCC Form 481 and Annual ETC Certification Polar Communications Mutual Aid Corp., Study Area Code 381630 PUC Docket Number P999/PR 14-8

Dear Dr. Haar:

On behalf of Polar Communications Mutual Aid Corporation, ("Polar Communications" or "Company") JSI files the attached Public and Trade Secret versions of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of Federal Communications Commission's rules.¹

Certain FCC Form 481 data contain Trade Secret financial information with independent economic value which is not generally known to, and not readily ascertainable by competitors of the Company which could obtain economic value from its disclosure. The information contained in attachments for which the Company seeks the withholding from public inspection is the entirety of data pertaining to the Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment. The Line 112 attachment includes competitively sensitive information related to proposed improvements or upgrades and maintenance the Company's network. The Company also requests withholding from the public documents that include detailed financial information provided at the FCC Form 481 Line 3017 attachment. The Company maintains this information as trade secret. Accordingly, this information qualifies as "trade secret information" as defined in Minn. Stat. 13.37(b), and the Company requests that this data be treated as trade secret information.

¹ 47 C.F.R. §§ 54.313, 54.422.

The Public filing contains a copy of the "Redacted - For Public Inspection" copy of the Company's 481 Form that will be filed with the FCC. This copy does not include the Trade Secret information described below.

The Trade Secret filing contains the "Confidential Copy" of the Company's 481 Form that has been filed with USAC and the FCC. The Confidential Copy contains the Trade Secret Information.

Please note that prior to 2013, Polar Telecommunications merged into Polar Communications Mutual Aid; however, the two study area codes remain so the company files two Form 481s in both North Dakota and Minnesota, as the Company has ETC status in both states. To reflect this in last year's certification of ETCs seeking high cost designation, the Minnesota Public Utilities Commission listed the company as "Polar Communications Mutual Aid (includes Polar Telecommunications)" with both study area codes indicated. The company respectfully asks that the company be listed the same on this year's list.

We request the Minnesota Public Utilities Commission to file the annual certification regarding high-cost and low income support with USAC and the FCC, pursuant to 47 CFR54.314 (a).

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall JSI Vice President 301-459-7590

jkuykendall@jsitel.com

Enclosures

FCC Form 481 FCC Form 481 - Carrier Annual Reporting OMB Control No. 3060-0986/OMB Control No. 3060-0819 REDACTED FOR PUBLIC INSPECTION **Data Collection Form** <010> Study Area Code 381630 <015> Study Area Name POLAR COMM MUT AID 2015 <020> Program Year

<030> Contact Name: Person USAC should contact

<030>	with questions about this data Shari Fland	lers	
<035>	Contact Telephone Number: 7012847221 Number of the person identified in data line <030>	ext.	
<039>	Contact Email Address: Email of the person identified in data line <030> sflanders@p	oolartel.com	
			54.313 54.422
A NINII I A	AL DEDORTING FOR ALL CARRIERS		Completion Completion
AININUA	AL REPORTING FOR ALL CARRIERS		(check box when complete)
<100>	Service Quality Improvement Reporting	(complete attached worksheet)	~ (IIIII)
	Outage Reporting (voice)	(complete attached worksheet)	V
<210>	cottage Neporting (voice) < check box if no outages to rep		V
<300>	Unfulfilled Service Requests (voice)		
<310>	Detail on Attempts (voice)		
.520	Jetan envictempes (reset)		
		(attach descriptiv	e document)
<320>	Unfulfilled Service Requests (broadband)	Ţ	· ////////////////////////////////////
<330>	Detail on Attempts (broadband)		
		(attach descript	ive document)
<400>	Number of Complaints per 1,000 customers (voice)		
<410>	Fixed 0.0		
<420>	Mobile 0.0		
<430>			
<440>	Fixed 0.0		
<450>	Mobile 0.0 Sorvice Quality Standards & Consumer Protection Pules Complian	200	
<500>	Service Quality Standards & Consumer Protection Rules Compliar	nce (check to indicate certification)	
	381630nd510.pdf		
<510>		(attached descriptive document)	V V
<600>	Functionality in Emergency Situations	(check to indicate certification)	<i>V V</i>
	381630nd610.pdf		
		(attached descriptive document)	
<610>			
<700>	Company Price Offerings (voice)	(complete attached worksheet)	<u> </u>
<710>	Company Price Offerings (broadband)	(complete attached worksheet)	
<800>		(complete attached worksheet)	
	Tribal Land Offerings (Y/N)?	(if yes, complete attached worksheet)	<u> </u>
<1000>	Voice Services Rate Comparability	(check to indicate certification)	
<1010	,	(attach descriptive document)	
<1100>	> Terrestrial Backhaul (Y/N)?	(if not, check to indicate certification)	
	0 0	,	
<1110>		(complete attached worksheet)	
<1200>	Terms and Condition for Lifeline Customers	(complete attached worksheet)	
	Price Cap Carriers, Proceed to Price Cap Additional Documentation		
<2000>	Including Rate-of-Return Carriers affiliated with Price Cap Local	Exchange Carriers (check to indicate certification)	
<2005>		(complete attached worksheet)	
	Rate of Return Carriers, Proceed to ROR Additional Documentati		
<3000>		(check to indicate certification)	<u> </u>
<3005>		(complete attached worksheet)	

	ervice Quality Improvement Reporting Ollection Form			FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060- July 2013	0819		
<010>	Study Area Code	381630					
<015>	Study Area Name	POLAR COMM	MUT AID				
<020>	Program Year	2015					
<030>	Contact Name - Person USAC should contact regarding this data	Shari Fland	ers				
<035>	Contact Telephone Number - Number of person identified in data line <030>	ata line <030> 7012847221 ext.					
<039>	Contact Email Address - Email Address of person identified in data line <030>	sflanders@p	olartel.com				
<110>	Has your company received its ETC certification from the FCC?	(ye	s / no) O				
<111>	If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?	(ye	s / no) O O				
<112>	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. 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 of CETC which only receives frozen support, your progress report is only required to address voice telephony service.	ompany is a	381630nd112.pdf				
	Please check these boxes below to confirm that the attached documents(s), on li 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.	ne		Name of Attached Document			
<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	used to improve service capacity					
<118>	Provide an explanation of network improvement targets not met in the prior calendar year.						

(200) Service Outage Reporting (Voice)	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	381630
<015>	Study Area Name	POLAR COMM MUT AID
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Shari Flanders
<035>	Contact Telephone Number - Number of person identified in data line <030>	7012847221 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	sflanders@polartel.com

<220>

>	<a>	<b1></b1>	<b2></b2>	<b3></b3>	<b4></b4>	<c1></c1>	<c2></c2>	<d></d>	<e></e>	<f></f>	<g></g>	<h></h>
	NORS Reference	Outage Start	Outage Start	Outage End	Outage End	Number of		911 Facilities	Service Outage	Did This Outage Affect Multiple		
	Number	Date	Time	Date		Customers Affected	Total Number of	Affected	Description (Check	Study Areas	Service Outage	Preventative
							Customers	(Yes / No)	all that apply)	(Yes / No)	Resolution	Procedures

(700) Price Offerings including Voice Rate Data	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	381630
<015>	Study Area Name	POLAR COMM MUT AID
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Shari Flanders
<035>	Contact Telephone Number - Number of person identified in data line <030>	7012847221 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	sflanders@polartel.com

<701> Residential Local Service Charge Effective Date

<702> Single State-wide Residential Local Service Charge

<703>

>]	<a1></a1>	<a2></a2>	<a3></a3>	<b1></b1>	<b2></b2>	<b3></b3>	<b4></b4>	<b5></b5>	<c></c>
Ī					Residential Local			Mandatory Extended Area	
-	State	Exchange (ILEC)	SAC (CETC)	Rate Type	Service Rate	State Subscriber Line Charge	State Universal Service Fee	Service Charge	Total per line Rates and Fees
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					See at	tached worksheet			
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(710) Broadband Price Offerings	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	381630
<015>	Study Area Name	POLAR COMM MUT AID
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Shari Flanders
<035>	Contact Telephone Number - Number of person identified in data line <030>	7012847221 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	sflanders@polartel.com

<711>	<a1></a1>	<a2></a2>	<b1></b1>	<b2></b2>	<c></c>	<d1></d1>	<d2></d2>	<d3></d3>	<d4></d4>
						Broadband Service -			Usage Allowance
				State Regulated		Download Speed	Broadband Service -	Usage Allowance	Action Taken When
	State	Exchange (ILEC)	Residential Rate	Fees	Total Rate and Fees	(Mbps)	Upload Speed (Mbps)	(GB)	Limit Reached (select)
•									
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				0	•				
				- See attacl	ned				
			1	worksheet -					
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. , .	erating Companies lection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013			
<010>	Study Area Code		381630			
<015>	Study Area Name		POLAR COMM MUT AID			
<020>	Program Year		2015			
<030>	Contact Name - Person I	USAC should contact regarding this data	Shari Flanders			
<035>	Contact Telephone Num	nber - Number of person identified in data line <030>	7012847221 ext.			
<039>	Contact Email Address -	Email Address of person identified in data line <030>	sflanders@polartel.com			
<810>	Reporting Carrier	Polar Communications Mutual Aid Corporation				
<811>	Holding Company	Polar Communications Mutual Aid Corporation				
<812>	Operating Company	Polar Communications Mutual Aid Corporation	1			

13>	<a1></a1>	<a2></a2>	<a3></a3>
	Affiliates	SAC	Doing Business As Company or Brand Designation
	See at	tached worksh	oot
	See all	laciled worksin	pet
-			
		+	

(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 <015> Study Area Name <020> Program Year <030> Contact Name - Person USAC should contact regarding this data <035> Contact Telephone Number - Number of person identified in data line <030> <039> Contact Email Address - Email Address of person identified in data line <030> <910> Tribal Land(s) on which ETC Serves	381630 POLAR COMM MUT AID 2015 Shari Flanders 7012847221 ext. sflanders@polartel.com
<920> Tribal Government Engagement Obligation	Name of Attached Document
§ 54.313(a)(9) includes:	lect s,No, IA)
<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.	

(1100) No	Terrestrial Backhaul Reporting		FCC Form 481
Data Coll	ection Form		OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	381630	
<015>	Study Area Name	POLAR COMM MUT AID	
<020>	Program Year	2015	
<030>	Contact Name - Person USAC should contact regarding this data	Shari Flanders	
<035>	Contact Telephone Number - Number of person identified in data line <030>	7012847221 ext.	
<039>	Contact Email Address - Email Address of person identified in data line <030>	sflanders@polartel.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)		

(1200) Terms and Condition for Lifeline Customers		FCC Form 481	
Lifeline		OMB Control No. 3060-0986/OMB Control No. 3060-0819	
Data Coll	ection Form	July 2013	
•			
<010>	Study Area Code	381630	
<015>	Study Area Name	POLAR COMM MUT AID	
<020>	Program Year	2015	
<030>	Contact Name - Person USAC should contact regarding this data	Shari Flanders	
<035>	Contact Telephone Number - Number of person identified in data line <030>	7012847221 ext.	
<039>	Contact Email Address - Email Address of person identified in data line <030>	sflanders@polartel.com	
<1210>	Terms & Conditions of Voice Telephony Lifeline Plans		
		Name of Attached Document	
<1220>	Link to Public Website HTTP ht	tp://www.polarcomm.com/resources/phone-assistance-program/	
"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) Pr	ice Cap Carrier Additional Documentation		FCC Form 481
,	ection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819	
	Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers		July 2013
meraamg	nate of neturn earners affiniated with thee ear Exercing earners		·
040			
<010>	Study Area Code	381630	
<015>	Study Area Name	POLAR COMM MUT AID	
<020>	Program Year Contact Name Person USAC should contact recording this data	2015	
<030> <035>	Contact Name - Person USAC should contact regarding this data Contact Telephone Number - Number of person identified in data line <030>	Shari Flanders 7012847221 ext.	
<039>	Contact Email Address - Email Address of person identified in data line <030>	sflanders@polartel.com	
(0332	Contact Email Address Email Address of person identified in data line 10505	silanders@polartel.com	
CHECK tr			h Cost support to offset access charge reductions, and Connect America Phase II
	support as set forth in 47 CFR § 54.313(b),(c),(d),(c	e) the information reported on this form and in tr	e 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)}		Ħ
	or a second control of the second control of		
	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)}		<u></u>
<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	ine 2021 contains the required information	
\2020>	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	ng access to broadband service in the	
	preceding calendar year.		
<2021>	Interim Progress Community Anchor Institutions		
		Name of At	tached Document Listing Required Information

		REDACTED FOR PUI	BLIC INSPECTION	
(3000) R	ate Of Return Carrier Additional Documentation		FCC Form 481	
Data Col	lection Form		OMB Control No.	3060-0986/OMB Control No. 3060-0819
			July 2013	
<010>	Study Area Code	381630		
<015>	Study Area Name	POLAR COMM MUT AID		
<020> <030>	Program Year Contact Name - Person USAC should contact regarding this data	2015		
<035>	Contact Telephone Number - Number of person identified in data line <030>	Shari Flanders 7012847221 ext.		
<039>	Contact Email Address - Email Address of person identified in data line <030>	sflanders@polartel.com		
CHECK t	the boxes below to note compliance on its five year service quality plan (pursual			ancial reporting requirements set forth in 47
	CFR § 54.313(f)(2). I further certify that the	e information reported on this form and in the docum	nents attached below is accurate.	
,,	Dunguage Danast on C Voca Dlan			
(3010)	Progress Report on 5 Year Plan Milestone Certification {47 CFR § 54.313(f)(1)(i)}			
	Wilestone Certification (47 Cr it § 34.313(1)(1)(1)	Name of Attached Desument Listing Requi	ized Information	
		Name of Attached Document Listing Requi	ired Information	
	Please check this box to confirm that the attached document(s), on line \S 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addreproviding 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 Inform	nation O	
(3013)	Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)}	(Yes,	:/No) ((C)	
	If yes, does your company file the RUS annual report	(Yes,	(No)	
		7	54.040(0)(0)	
Please	check these boxes to confirm that the attached document(s), on line 301	r, contains the required information pursuant to §	54.313(f)(2) compliance requires	5:
(3015)	Electronic copy of their annual RUS reports (Operating Report for		L V	
(2046)	Telecommunications Borrowers)	at Flame		
(3016)	Document(s) for Balance Sheet, Income Statement and Statement of Ca		V	•
		381630nd3017.pdf		
(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 Inform	mation	
(3018)	If the response is no on line 3014, Is your company audited?		es/No)	
(3016)		(10		
	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)				
(3013)	Either a copy of their audited financial statement; or (2) a financial report in a f	ormat comparable to RUS Operating Report for Telecom	nmunications [
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of C	ash Flows	Щ	
, ,				
(3021)	Management letter issued by the independent certified public accountant that	performed the company's financial audit.	4	
	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:			
	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,			
(2222)	Underlying information subjected to a review by an independent certified			
(3023)	public accountant			
(3024)	Underlying information subjected to an officer certification.		 	
(3025)	Document(s) for Balance Sheet, Income Statement and Statement of Ca	ash Flows	4	
	.,			
	I			
(3026)	Attach the worksheet listing required information			
	I			
			ı	
		Name of Attached Document Listing Required Informa	ation	

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

<010>	Study Area Code	381630
<015>	Study Area Name	POLAR COMM MUT AID
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Shari Flanders
<035>	Contact Telephone Number - Number of person identified in data line <030>	7012847221 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	sflanders@polartel.com

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

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients

I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.

Name of Reporting Carrier:

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:

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.

	tion - Agent / Carrier lection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	381630
<015>	Study Area Name	POLAR COMM MUT AID
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Shari Flanders
<035>	Contact Telephone Number - Number of person identified in data line <030>	7012847221 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	sflanders@polartel.com

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

I certify that (Name of Agent) <u>John Staurulakis</u> , <u>Inc.</u> 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.			
Name of Authorized Agent: John Staurulakis, Inc.			
Name of Reporting Carrier: POLAR COMM MUT AID			
Signature of Authorized Officer: CERTIFIED ONLINE	Date: 06/18/2014		
Printed name of Authorized Officer: David Dunning			
Title or position of Authorized Officer: GM/CEO			
Telephone number of Authorized Officer: 7012847221 ext.			
Study Area Code of Reporting Carrier: 381630	Filing Due Date for this form: 06/30/2014		
	hed by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment Title 18 of the United States Code, 18 U.S.C. § 1001.		

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				
l, 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 repo 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.	• , ,			
Name of Reporting Carrier: POLAR COMM MUT AID				
Name of Authorized Agent or Employee of Agent: John Staurulakis, Inc.				
Signature of Authorized Agent or Employee of Agent: CERTIFIED ONLINE Date: 06/18/2014				
Printed name of Authorized Agent or Employee of Agent: Cassandra Heyne				
Title or position of Authorized Agent or Employee of Agent Consultant				
Telephone number of Authorized Agent or Employee of Agent: 3014597590 ext.				
Study Area Code of Reporting Carrier: 381630 Filing Due Date for this form: 06/30/2014				
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 18 of the United States Code, 18 U.S.C. § 1001.	ine or imprisonment under Title			

Attachments

POLAR COMMUNICATIONS MUTAL AID CORP. (SAC 381630) ATTACHMENT - LINE 112 FIVE YEAR SERVICE QUALITY IMPROVEMENT PLAN

ATTACHMENT REDACTED IN ENTIRETY

Polar Communications Mutual Aid Corporation's Demonstration of Compliance with Applicable Service Quality Standards and Consumer Protection Rules

In establishing this certification in its 2005 ETC Order,¹ the FCC found that an ETC must make "a specific commitment to objective measures to protect consumers." The Commission found that for wireless ETCs, compliance with CTIA's Consumer Code for Wireless Service would satisfy this requirement" and that the sufficiency of other commitments would be considered on a case-by-case basis.³ In this context, the FCC stated, "to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement."

Polar Communications Mutual Aid Corporation ("Company") hereby certifies that it is complying with applicable service quality standards and consumer protection rules. The Company is subject to consumer protection obligations under federal law and, to a limited extent under North Dakota state law as a telecommunications carrier subject to North Dakota Public Service Commission regulation. These obligations include, but are not limited to, the following: (1) adherence to state requirements that the Company complies with consumer protection and service quality standards pursuant to North Dakota Administrative Code Article 69, including customer requests for lowest price service alternatives (69-09-05-01), discontinuance of

¹ Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) ("2005 ETC Order").

² *Id.* at para. 28.

³ *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: "(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy." *Id.* at n. 71.

telecommunications services (69-09-05-02), deposits and guarantees (69-09-05-03); (2) truth-in-billing requirements, and (3) CPNI, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

The Company also provides service in Minnesota and is subject to consumer protection obligations under Minnesota state law. These obligations include, but are not limited to, the following: (1) filing a Local Exchange Tariff pursuant to the requirements of Minnesota Public Utility Commission which disclose rates, terms and conditions of service to customers; (2) adherence to state consumer protection and service quality requirements governing telephone providers which require compliance with the Minnesota Administrative Rules listed below; (3) truth-in-billing requirements; and (4) CPNI, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

Minnesota Administrative Rules:

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 BILILNG; 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 SERVICE.

7810.2000 NONPERMISSIBLE REAONS 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 MAINTENANCE OF PLANT AND EQUIPMENT.
- 7810.3100 EMERGENCY OPERATIONS.

ENGINEERING

- 7810.3200 CONSTRUCTION OF TELEPHONE PLANT.
- 7810.3300 MAINTENANCE OF PLANT AND EQUIPMENT.
- 7810.3900 EMERGENCY OPERATIONS.

INSPECTIONS, TESTS, SERVICE REQUIRMENTS

- 7810.4100 ACCESS TO TEST FACILITIES.
- 7810.4300 ACCURANCE 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 CUTOMER TROUBLE REPORTS.
- 7810.6000 PROTECTIVE MEASURES.
- 7810.6100 SAFETY PROGRAM.

The Company is subject to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such

services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in F.C.C. 47 C.F.R. Part 8 §8.3.

Polar Communications Mutual Aid Corporation's Demonstration of Ability to Function in Emergency Situations

Polar Communications Mutual Aid Corporation ("Company") hereby certifies that it is able to function in emergency situations as set forth in §54.202(a)(2)¹ and North Dakota Administrative Code 69-09-05-12. The Company's voice and broadband network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow the Company to manage traffic spikes throughout its network, as emergency situations require.

Specifically, each central office building is supplied with standby generators and battery back-up that enable the central office to keep running until power is restored so long as fuel is available, or until system changes are made to reroute traffic. The Company's central office can maintain 8 hours, plus or minus 15 percent, of battery reserve rated for peak traffic load requirements, and a permanent auxiliary power unit is installed or a mobile power source is available which can be delivered and connected within four hours. The Company has battery backup at all office locations and in its electronic equipment sites capable of running for a minimum of 8 hours, plus or minus 15

Section 54.202(a)(2) requires ETCs that are designated by the Commission to "demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations."

percent. Length of run time is determined by the equipment serving the area and the number of customers working out of the equipment. Generators are installed at all Central Office locations. They will continue to run as long as the Company has access to fuel. The Company tests the batteries at least once per year.

The Company also provides service in Minnesota. Pursuant to Minnesota

Administrative Rule 7810.3900, "Emergency Operations," the Company 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:

- o A minimum of four hours of battery service in each central office.
- o A permanently installed power unit in exchanges exceeding 5,000 lines.
- O Mobile power units that can be delivered on short notice and which can be readily connected in offices without installed emergency power facilities.

The Company 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.

(700) Price Offerings including Voice Rate Data	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	381630
<015>	Study Area Name	POLAR COMM MUT AID
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Shari Flanders
<035>	Contact Telephone Number - Number of person identified in data line <030>	7012847221 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	sflanders@polartel.com

<701> Residential Local Service Charge Effective Date

<702> Single State-wide Residential Local Service Charge

<703>

<a1></a1>	<a2></a2>	<a3></a3>	<b1></b1>	<b2></b2>	<b3></b3>	<b4></b4>	<b5></b5>	<c></c>
				Residential Local			Mandatory Extended Area	
State	Exchange (ILEC)	SAC (CETC)	Rate Type	Service Rate	State Subscriber Line Charge	State Universal Service Fee	Service Charge	Total per line Rates and Fees
MN	East Drayton		FR	17.95	0.0	0.0	0.0	17.95
ND	St Thomas		FR	17.95	0.0	0.0	0.0	17.95
ND	Michigan		FR	17.95	0.0	0.0	0.0	17.95
ND	Cavalier		FR	17.95	0.0	0.0	0.0	17.95
ND	Park River		FR	17.95	0.0	0.0	0.0	17.95
ND	Aneta		FR	17.95	0.0	0.0	0.0	17.95
ND	Petersburg		FR	17.95	0.0	0.0	0.0	17.95
ND	Dahlen		FR	17.95	0.0	0.0	0.0	17.95
ND	Niagara		FR	17.95	0.0	0.0	0.0	17.95
ND	Drayton		FR	17.95	0.0	0.0	0.0	17.95
ND	Galesburg		FR	15.15	0.0	0.0	0.0	15.15
ND	Lankin		FR	17.95	0.0	0.0	0.0	17.95
ND	Brocket		FR	17.95	0.0	0.0	0.0	17.95
ND	Crystal		FR	17.95	0.0	0.0	0.0	17.95
ND	Inkster		FR	17.95	0.0	0.0	0.0	17.95
ND	Hunter		FR	14.0	0.0	0.0	0.0	14.0
ND	Neche		FR	17.95	0.0	0.0	0.0	17.95
ND	Hoople		FR	17.95	0.0	0.0	0.0	17.95
ND	Nekoma		FR	17.95	0.0	0.0	0.0	17.95
ND	Fairdale		FR	17.95	0.0	0.0	0.0	17.95
ND	Arthur		FR	14.0	0.0	0.0	0.0	14.0

(700) Price Offerings including Voice Rate Data	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	381630
<015>	Study Area Name	POLAR COMM MUT AID
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Shari Flanders
<035>	Contact Telephone Number - Number of person identified in data line <030>	7012847221 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	sflanders@polartel.com

<701> Residential Local Service Charge Effective Date
<702> Single State-wide Residential Local Service Charge

<703>

<a1></a1>	<a2></a2>	<a3></a3>	<b1></b1>	<b2></b2>	<b3></b3>	<b4></b4>	<b5></b5>	<c></c>
				Residential Local			Mandatory Extended Area	
State	Exchange (ILEC)	SAC (CETC)	Rate Type	Service Rate	State Subscriber Line Charge	State Universal Service Fee	Service Charge	Total per line Rates and Fees
ND	Edinburg		FR	17.95	0.0	0.0	0.0	17.95

(710) Broadband Price Offerings	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	381630
<015>	Study Area Name	POLAR COMM MUT AID
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Shari Flanders
<035>	Contact Telephone Number - Number of person identified in data line <030>	7012847221 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	sflanders@polartel.com

711>	<a1></a1>	<a2></a2>	<b1></b1>	<b2></b2>	<c> <d1></d1></c>	<d2></d2>	<d3></d3>		<d4></d4>
	State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rates and Fees	Broadband Service - Download Speed (Mbps)	Broadband Service -Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached {select}
	ND	ALL	44.95	0.0	44.95	5.0	1.0	0.0	Other, no usage allowance
Ī	ND	ALL	54.95	0.0	54.95	10.0	1.0	0.0	Other, no usage allowance
Ì	ND	ALL	84.95	0.0	84.95	10.0	2.0	0.0	Other, no usage allowance
Ī	ND	ALL	199.95	0.0	199.95	10.0	5.0	0.0	Other, no usage allowance
Ī	ND	ALL	399.95	0.0	399.95	20.0	10.0	0.0	Other, no usage allowance
	ND	ALL	599.99	0.0	599.99	50.0	20.0	0.0	Other, no usage allowance
	ND	ALL	1199.95	0.0	1199.95	100.0	50.0	0.0	Other, no usage allowance
	MN	East Drayton	44.95	0.0	44.95	5.0	1.0	0.0	Other, no usage allowance
	MN	East Drayton	54.95	0.0	54.95	10.0	1.0	0.0	Other, no usage allowance
	MN	East Drayton	84.95	0.0	84.95	10.0	2.0	0.0	Other, no usage allowance
	MN	East Drayton	199.95	0.0	199.95	10.0	5.0	0.0	Other, no usage allowance
-	MN	East Drayton	399.95	0.0	399.95	20.0	10.0	0.0	Other, no usage allowance
-	MN	East Drayton	599.95	0.0	599.95	50.0	20.0	0.0	Other, no usage allowance
	MN	East Drayton	1199.95	0.0	1199.95	100.0	50.0	0.0	Other, no usage allowance
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	perating Companies		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code		381630
<015>	Study Area Name		POLAR COMM MUT AID
<020>	Program Year		2015
<030>	Contact Name - Person U	SAC should contact regarding this data	Shari Flanders
<035>	Contact Telephone Numb	per - Number of person identified in data line <030>	7012847221 ext.
<039>	Contact Email Address - E	mail Address of person identified in data line <030>	sflanders@polartel.com
<810>	Reporting Carrier	Polar Communications Mutual Aid Corporation	n
<811>	Holding Company	Polar Communications Mutual Aid Corporation	n
<812>	Operating Company	Polar Communications Mutual Aid Corporation	n

<812> Operating Company

<813>	<a1></a1>	<a2></a2>	<a3></a3>
	Affiliates	SAC	Doing Business As Company or Brand Designation
=	Polar Communications Mutual Aid Corporation f/k.a Polar Telecommunications	381614	
_	Polar Telcom, Inc.	389003	
	Wolverton Telephone Company (ND)	381509	
	Wolverton Telephone Company (MN)	361512	
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POLAR COMMUNICATIONS MUTAL AID CORP. (SAC 381630) ATTACHMENT - LINE 3017 ATTACHMENT REDACTED IN ENTIRETY