

service quality improvement plan targets, providing an explanation regarding any network improvement targets that were not met.

3. The Company previously provided to this Commission a copy of its “five-year service quality improvement plan” as submitted to the FCC. This five-year plan includes estimates of expenditures to be made by the Company for calendar years 2015-2019. At this time, however, consistent with the Commission’s Order Waiving ETC Certification Requirements issued on April 5, 2018 in Docket AA18-01, the Company also provides the Commission with a “two-year service quality improvement plan” (Confidential Exhibit B) as required by ARSD § 20:10:32:54(1) including planned expenditures for calendar years 2019 and 2020 relating to the provision, maintenance, and upgrading of facilities and services for which universal service support is intended.

4. The Company is using federal high cost universal service support amounts thus far received in 2018 to meet the objectives identified in its service quality improvement plans and will continue to do so with respect to universal service amounts received in 2019. This use of federal universal service support will enable the Company to: (A) maintain rates for its local exchange services that are affordable and reasonably comparable to rates being charged for the same services in urban areas; and (B) upgrade its telecommunications facilities and equipment as necessary to meet evolving service requirements, including those related to broadband services, and maintain high quality service. The use of federal high cost universal service support for these purposes is clearly consistent with the federal universal service provisions.

5. Attached as Exhibit C is the information required by ARSD §§ 20:10:32:54(3), 20:10:32:54(5), and 20:10:32:54(5). Attached as Exhibit D is a document containing the certifications required under the provisions of ARSD §§ 20:10:32:54(6) and 20:10:32:54(7). The remaining ETC certification rule provisions found in ARSD §§ 20:10:32:54(8) and 20:10:32:54(9) have by Order been waived by this Commission.

6. Based on all the foregoing information, including all information provided within Confidential Exhibits A and B, and Exhibits C and D (attached hereto), the Company requests that this Commission issue an appropriate certification to the FCC and USAC indicating that the Company, Inc. is in compliance with 47 U.S.C. § 254(e) and should receive all federal high cost universal service support determined for distribution to the Company in 2019. In order to ensure that this certification is issued to the FCC prior to October 1, 2018, the Company would further ask the Commission to expedite the process, to the extent needed to meet such deadline.

Dated this 27 day of June 2018.

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