



THOMAS, LONG,  
NIESEN & KENNARD

*Attorneys and Counsellors at Law*

NORMAN J. KENNARD  
OHIO ID No. 0090006  
Direct Dial: 717.255.7627  
nkennard@thomaslonglaw.com

October 15, 2013

Via Federal Express

Barcy F. McNeal, Secretary  
Public Utilities Commission of Ohio  
180 East Broad Street  
Columbus, OH 43215

Re: *In the Matter of the Annual Filing Requirements for 2013 Pertaining to the Provisioning of High Cost Universal Service*, Case No. 13-1115-TP-COI; **2013 FCC 481**

Dear Secretary McNeal:

Enclosed for filing in the above-captioned docket on behalf of Orwell Telephone Company ("Orwell") please find the Federal Communications Commission's Form 481. No aspect of the filing is marked confidential.

Orwell requests that you certify to the FCC, as required by 47 C.F.R § 54.314, by the deadline of December 16, 2013 that Orwell should continue receiving Federal high cost support.

Should you or any member of the Commission Staff have any questions, please do not hesitate to contact me. Thank you for your attention to this matter.

Sincerely,

THOMAS, LONG, NIESEN & KENNARD

By

  
Norman J. Kennard

NJK:tlt  
Enclosure

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

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

<010> Study Area Code	300649
<015> Study Area Name	GRACELL TEL CO
<020> Program Year	2014
<030> Contact Name: Person USAC should contact with questions about this data	Barbara Galardo
<035> Contact Telephone Number: Number of the person identified in data line <030>	207-535-4126
<039> Contact Email Address: Email of the person identified in data line <030>	bgalardo@fairpoint.com

ANNUAL REPORTING FOR ALL CARRIERS		S4.313 Completion Required	S4.422 Completion Required
<100> Service Quality Improvement Reporting	(complete attached worksheet)	<input type="checkbox"/>	<input 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			
<300> Unfulfilled Service Requests (voice)	0	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<310> Detail on Attempts (voice)	(attach descriptive document)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<320> Unfulfilled Service Requests (broadband)		<input type="checkbox"/>	<input type="checkbox"/>
<330> Detail on Attempts (broadband)	(attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>
<400> Number of Complaints per 1,000 customers (voice)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<410> Fixed	0.0		
<420> Mobile			
<430> Number of Complaints per 1,000 customers (broadband)		<input type="checkbox"/>	<input type="checkbox"/>
<440> Fixed			
<450> Mobile			
<500> Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510> 300649oh510	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600> Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610> 300649oh610	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700> Company Price Offerings (voice)	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>
<710> Company Price Offerings (broadband)	(complete attached worksheet)	<input type="checkbox"/>	<input 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 type="checkbox"/>
<1000> Voice Services Rate Comparability	(check to indicate certification)	<input type="checkbox"/>	<input type="checkbox"/>
<1010> <input type="checkbox"/>	(attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>
<1100> Terrestrial Backhaul (Y/N)? <input checked="" type="radio"/> <input type="radio"/>	(if not, check to indicate certification)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1110> <input type="checkbox"/>	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>
<1200> Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet**  
 Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000>	(check to indicate certification)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<2005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

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

**(100) Service Quality Improvement Reporting  
Data Collection Form**

FCC Form 481

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

July 2013

<010>	Study Area Code	300649
<015>	Study Area Name	ORWELL TEL CO
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Barbara Calardo
<035>	Contact Telephone Number - Number of person identified in data line <030>	207-535-4126
<039>	Contact Email Address - Email Address of person identified in data line <030>	bcalardo@fairpoint.com
<110>	Has your company received its ETC certification from the FCC?	(yes / no) <input type="radio"/> <input checked="" type="radio"/>
	If your answer to Line <110> is yes, do you have an existing §54.202(a) "5	
<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.

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 Name of Attached Document (.pdf)

Please check these boxes below to confirm that the attached PDF, 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.

<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>

(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	300649
<015>	Study Area Name	ORWELL TEL CO
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Barbara Galardo
<035>	Contact Telephone Number - Number of person identified in data line <030>	207-535-4126
<039>	Contact Email Address - Email Address of person identified in data line <030>	bgalardo@fairpoint.com

[illegible]

(700) Price Offerings Including Voice Rate Data  
Data Collection Form

FCC Form 481

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

July 2013

<010> Study Area Code 300649

<01S> Study Area Name	ORWELL TSL CO
-----------------------	---------------

2014	
Program Year	2014

<030> Contact Name - Person USAC should contact regarding this data Barbara Galardo

<035> Contact Telephone Number - Number of person identified in data line <030> 207-535-4126

<039> Contact Email Address - Email Address of person identified in data line <030> bgalardo@fairpoint.com

&lt;701&gt; Residential Local Service Charge Effective Date

1/1/2013

<702> Single State-wide Residential Local Service Charge

[illegible]

<010>	Study Area Code	300649
<015>	Study Area Name	ORWELL TEL CO
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Berbara Galardo
<035>	Contact Telephone Number - Number of person identified in data line <030>	207-535-4126
<039>	Contact Email Address - Email Address of person identified in data line <030>	bgalardo@fairpoint.com

[illegible]

(800) Operating Companies  
Data Collection Form

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

<010>	Study Area Code	300649
<015>	Study Area Name	ORWELL TEL CO
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Barbara Galardo
<035>	Contact Telephone Number - Number of person identified in data line <030>	207-535-4126
<039>	Contact Email Address - Email Address of person identified in data line <030>	bgalardo@fairpoint.com
<810>	Reporting Carrier	Orwell Tel Co.
<811>	Holding Company	FairPoint Communications Inc.
<812>	Operating Company	Orwell Tel Co.

[illegible]

**(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	300649
<015>	Study Area Name	ORNELL TEL CO
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Barbara Galardo
<035>	Contact Telephone Number - Number of person identified in data line <030>	207-535-4126
<039>	Contact Email Address - Email Address of person identified in data line <030>	bgalardo@fairpoint.com


&lt;910&gt; Tribal Land(s) on which ETC Serves

&lt;920&gt; Tribal Government Engagement Obligation

Name of Attached Document (.pdf)

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached PDF, 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	300649
<015>	Study Area Name	ORWELL TEL CO
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Barbara Galarde
<035>	Contact Telephone Number - Number of person identified in data line <030>	207-535-4126
<039>	Contact Email Address - Email Address of person identified in data line <030>	bgalarde@fairpoint.com

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

☐

Please check this box to confirm the reporting carrier offers  
<1130> 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 Collection Form

July 2013

<010>	Study Area Code	300649
<015>	Study Area Name	ORMELL TEL CO
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Barbara Galardo
<035>	Contact Telephone Number - Number of person identified in data line <030>	207-535-4126
<039>	Contact Email Address - Email Address of person identified in data line <030>	bgalardo@fairpoint.com

&lt;1210&gt; Terms &amp; Conditions of Voice Telephony Lifeline Plans

300649oh1210

Name of attached document (.pdf)

&lt;1220&gt; Link to Public Website

HTTP [www.tariffs.net/fairpoint/tior.asp?cid=1644](http://www.tariffs.net/fairpoint/tior.asp?cid=1644)

"Please check these boxes below to confirm that the attached PDF, 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****Data Collection Form**

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

FCC Form 481

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

July 2013

<010>	Study Area Code	300649
<015>	Study Area Name	ORWELL TEL CO
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Barbara Galardo
<035>	Contact Telephone Number - Number of person identified in data line <030>	207-535-4126
<039>	Contact Email Address - Email Address of person identified in data line <030>	bgalardo@airpoint.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 PDF, 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

\_\_\_\_\_

## (3000) Rate of Return Carrier Additional Documentation

Data Collection Form

FCC Form 481

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

July 2013

<010>	Study Area Code	300649
<015>	Study Area Name	ORWELL TEL CO
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Barbara Galardo
<035>	Contact Telephone Number - Number of person identified in data line <030>	207-535-4126
<039>	Contact Email Address - Email Address of person identified in data line <030>	bgalardo@fairpoint.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.

## Progress Report on 5 Year Plan

(3010)	Milestone Certification (47 CFR § 54.313(f)(1)(i)) Please check this box to confirm that the attached PDF, on line 3012, contains the required information pursuant to § 54.313(f)(1)(i), 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.	Name of Attached Document Listing Required Information	<input type="checkbox"/>
(3012)	Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))	Name of Attached Document Listing Required Information	<input type="checkbox"/> (Yes/No)
(3013)	Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))		<input type="checkbox"/> (Yes/No)
(3014)	If yes, does your company file the RUS annual report Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:		<input type="checkbox"/>
(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)		<input type="checkbox"/>
(3016)	PDF of Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(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	<input type="checkbox"/> (Yes/No)
(3018)	If the response is no on line 3014, is your company audited? 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:		<input type="checkbox"/>
(3019)	Either a copy of their audited financial statements; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications		<input type="checkbox"/>
(3020)	PDF of Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(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:		<input type="checkbox"/>
(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,		<input type="checkbox"/>
(3023)	Underlying information subjected to a review by an independent certified public accountant		<input type="checkbox"/>
(3024)	Underlying information subjected to an officer certification.		<input type="checkbox"/>
(3025)	PDF of Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3026)	Attach the worksheet listing required information	Name of Attached Document Listing Required Information	<input type="checkbox"/>

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0985/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	300649
<015> Study Area Name	ORWELL TEL CO
<020> Program Year	2014
<030> Contact Name - Person USAC should contact regarding this data	Barbara Galardo
<035> Contact Telephone Number - Number of person identified in data line <030>	207-535-4126
<039> Contact Email Address - Email Address of person identified in data line <030>	bgalardo@fairpoint.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:	ORWELL TEL CO
Signature of Authorized Officer:	CERTIFIED ONLINE Date
Printed name of Authorized Officer:	Nike Shrivani
Title or position of Authorized Officer:	VP Regulatory
Telephone number of Authorized Officer:	207-535-4150
Study Area Code of Reporting Carrier:	300649 Filing Due Date for this form: 10/15/2013
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.	

## Attachments

**(800) Operating Companies**  
Data Collection Form

FCC Form 431

OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	300649
<015>	Study Area Name	ORWELL TEL CO
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Barbara Galarido
<035>	Contact Telephone Number - Number of person identified in data line <030>	207-535-4126
<039>	Contact Email Address - Email Address of person identified in data line <030>	bgalarido@fairpoint.com
<810>	Reporting Carrier	Orwell Tel Co.
<811>	Holding Company	FairPoint Communications Inc.
<812>	Operating Company	Orwell Tel Co.

<813>	<a1>	<a2>	<a3>
	Affiliates	SAC	Doing Business As Company or Brand Designation
	(f/k/a FairPoint Communications Solutions Corp., f/k/a FairPoint Communications Corp.)		
	BE Mobile Communications, Incorporated		Bentleyville Long Distance
	Bentleyville Communications Corporation	170145	dba FairPoint Communications
	Berkshire Cable Corp.		
	Berkshire Cellular, Inc.		
	Berkshire New York Access, Inc.		
	Berkshire Telephone Corporation	150073	dba FairPoint Communications
	Big Sandy Telecom, Inc.	462192	dba FairPoint Communications
	Bluestem Telephone Company	411835	dba FairPoint Communications
	C & E Communications, Ltd.		
	Chautauqua & Erie Communications, Inc.		
	Chautauqua and Erie Telephone Corporation	150078	dba FairPoint Communications
	China Telephone Company	100004	dba FairPoint Communications
	Chouteau Telephone Company	431981	dba FairPoint Communications
	Columbine Telecom Company (f/k/a Columbine Acquisition Corp.)	462204	dba FairPoint Communications
	Columbus Grove Telephone Company	300604	dba FairPoint Communications
	COM Networks, Inc.		
	Comerco, Inc.		
	Community Service Telephone Co.	100015	dba FairPoint Communications
	C-R Communications, Inc.		
	C-R Long Distance, Inc.		
	C-R Telephone Company	341809	dba FairPoint Communications
	El Paso Long Distance Company		

(800) Operating Companies  
Data Collection Form

PCC Form 481

OMB Control No. 3060-0985/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	300649
<015>	Study Area Name	ORWELL TEL CO
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Barbara Galardo
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<039>	Contact Email Address - Email Address of person identified in data line <030>	bgalardo@fairpoint.com
<810>	Reporting Carrier	Orwell Tel Co.
<811>	Holding Company	FairPoint Communications Inc.
<812>	Operating Company	Orwell Tel Co.

<813>	<01>	<02>	<03>
	Affiliates	SAC	Doing Business As Company or Brand Designation
	Ellensburg Telephone Company	522412	dba FairPoint Communications
	Eltel Long Distance Corp.		
	Enhanced Communications of Northern New England Inc.		
	ExOp of Missouri, Inc.		
	FairPoint Broadband, Inc.		
	FairPoint Business Services LLC		
	FairPoint Carrier Services, Inc.		
	FairPoint Communications Missouri, Inc.	421472	dba FairPoint Communications
	FairPoint Logistics, Inc. (f/k/a MJD Capital Corp.)		
	FairPoint Vermont, Inc.		
	Germantown Independent Telephone Company	300618	dba FairPoint Communications
	Germantown Long Distance Company		
	GTC Communications, Inc. (f/k/a TPG Communications, Inc.)		
	GTC, Inc.	210291	(Floral) dba FairPoint Communications
	GTC, Inc.	210329	(Perry) dba FairPoint Communications
	Maine Telephone Company	106025	dba FairPoint Communications
	Marianna and Scenery Hill Telephone Company	170185	dba FairPoint Communications
	Marianna Tel, Inc.		
	MJD Services Corp.		
	MJD Ventures, Inc.		
	Northern New England Telephone Operations LLC - Maine	105111	dba FairPoint Communications
	Northern New England Telephone Operations LLC - New Hampshire	125113	dba FairPoint Communications
	Northland Telephone Company of Maine, Inc.	103313	dba FairPoint Communications

(800) Operating Companies  
Data Collection Form

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

<010> Study Area Code 300649  
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 <035> Contact Telephone Number - Number of person identified in data line <030> 207-535-4126  
 <039> Contact Email Address - Email Address of person identified in data line <030> bgalardo@fairpoint.com  
 <810> Reporting Carrier Orwell Tel Co.  
 <811> Holding Company FairPoint Communications Inc.  
 <812> Operating Company Orwell Tel Co.

<813>	<a1>	<a2>	<a3>
	Affiliates	SAC	Doing Business As Company or Brand Designation
	Odin Telephone Exchange, Inc.	341065	dba FairPoint Communications
	Orwell Communications, Inc.		
	Orwell Telephone Company	300649	dba FairPoint Communications
	Peoples Mutual Long Distance Company		
	Peoples Mutual Telephone Company	190244	dba FairPoint Communications
	Quality One Technologies, Inc.		
	Ravenswood Communications, Inc.		
	Sidney Telephone Company	103313	dba FairPoint Communications
	ST Enterprises, Ltd.		
	ST Long Distance, Inc.		
	St. Joe Communications, Inc.	210339	dba FairPoint Communications
	Standish Telephone Company	100025	dba FairPoint Communications
	Sunflower Telephone Company, Inc.	461835	dba FairPoint Communications
	Taconic Technology Corp.		
	Taconic TelCom Corp.		
	Taconic Telephone Corp.	150084	dba FairPoint Communications
	Telephone Operating Company of Vermont LLC	145115	dba FairPoint Communications
	The El Paso Telephone Company	341004	dba FairPoint Communications
	UI Long Distance, Inc.		Northland Long Distance
	Unite Communications Systems, Inc.		
	Utilities, Inc.		
	YCOM Networks Inc.	522453	dba FairPoint Communications

**Orwell Telephone Company**

**Ohio**

**300649**

**Service Quality Reporting/Consumer Protection Rules Compliance:**

Orwell Telephone Company, hereby certifies that it is complying with applicable service quality standards and consumer protection rules. The Company complies with service quality and consumer protection provisions under state law. These provisions include, but are not limited to, the following: (1) filing a Local Exchange Tariff pursuant to the requirements of The Ohio Public Service Commission which discloses rates, terms and conditions of service to customers; (2) compliance with state consumer protection provisions relating to Customer Services as identified in the Code of State Regulations, compliance with provisions for Quality of Service as identified in the Code of State Regulations, compliance with Service Objectives as identified in the Code of State Regulations, compliance with customer Inquiry procedure as identified in the Code of State Regulations, compliance with Dispute standards as identified in the Code of State Regulations; (3) compliance with truth-in-billing requirements; and (4) compliance with Federal CPNI rules, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

In establishing this certification in its *2005 ETC Order*,<sup>1</sup> the FCC found that an ETC must make "a specific commitment to objective measures to protect consumers."<sup>2</sup> 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. 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."<sup>3</sup>

Orwell Telephone Company, is not currently subject to service quality reporting. The Ohio Public Utilities Commission's Rules Chapter 4901:1-6 "Telephone Company Procedures and Standards" section 4901:1-6-12 "Service Requirements for BLES" states "A local exchange carrier (LEC) providing basic local exchange service (BLES) shall conduct its operations so as to ensure that the service is available, adequate, and reliable consistent with applicable industry standards." FairPoint Communications currently is not required to report any service quality results unless requested by the Ohio Public Utilities Commission. For the service quality standards FairPoint Communications does track (a) Installation within 5 business days; (b) Out of Service Repair within 24 hours; and (c) Service Affecting Repair within 72 hours. Its results are available, adequate, and reliable consistent with applicable industry standards.

If a customer has a concern about their FairPoint Communications' service or billing, he/she can contact repair service, technical support or customer service with information found on their statement. Customers may also contact agencies, through information posted in the phone directory, website, and tariff pages. All consumer complaints whether from Attorney Generals' offices, Public Utility Commissions, Better Business Bureaus, Federal Communications Commission and all other agencies are sent to the FairPoint Communications' Maine office via U.S. Mail or by electronic mail at [consumer@fairpoint.com](mailto:consumer@fairpoint.com). The complaints are directed to the appropriate responsible Company Team member within FairPoint Communications for resolution and response to the customer.

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<sup>1</sup> *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").

<sup>2</sup> *Id.* at para. 28.



FairPoint Communications

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Barney Boynton  
Director, Operational Risk

## Business Continuity Plan Overview

### Introduction

FairPoint Communications, Inc. ("FairPoint") is committed to maintaining a vigilant state of disaster preparedness for the interests of our customers, stockholders, employees and other critical stakeholders.

The purpose of our Business Continuity Plan (BCP) is to define the disaster preparedness and recovery protocols and procedures required to restore FairPoint's critical business support functions, inside and outside plant systems and operations within FairPoint's operating footprint.

BCP components detail FairPoint's procedures for preparing for and responding to an emergency situation affecting our ability to deliver core services to our customers and our ability to meet legal dictates, and regulatory requirements.

This document discusses the following:

- BCP Scope & Structure
- Recovery Strategies and Logistics
- Plan Maintenance and Exercising

### BCP Scope

FairPoint's business continuity response planning is concentrated on two critical operational areas:

- Customer Interfacing – It is recognized that a "business impact" only occurs when an external-interfacing element is disrupted. In essence, this means that if FairPoint experiences a disruptive event, but one that does not breach the outer-shell of the FairPoint operation and interrupt critical customer services, customer product or other external end-user, then it does not have a business impact, as defined by the BCP
- Infrastructure Integrity – Without critical infrastructure systems, the ability for all other FairPoint business operations (back/front office) can come to a halt. It is these infrastructure systems that provide the critical human-factor of our customer-interfacing services. Critical infrastructure would address such services / systems as, building space for staff, service utilities, telecom network, IT network, etc.

The BCP has been developed to assure the continuity of critical customer interfacing services and systems should a physical incident or workforce disruption event occur, which affects:

- IT/IS
- Administrative and Support Operations
- Inside and Outside Plant Operations
- NOC (Network Operations Center)
- E-9-1-1
- Dispatch
- Repair Center

FairPoint has developed response / recovery strategies addressing physically disruptive incidents and workforce related disruptive incidents (i.e., work-stoppage and pandemic). All response strategies are based on recovery time objectives of those department functions and critical infrastructure systems essential to sustain customer interfacing services.



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### **BCP Structure**

The BCP consists of several components:

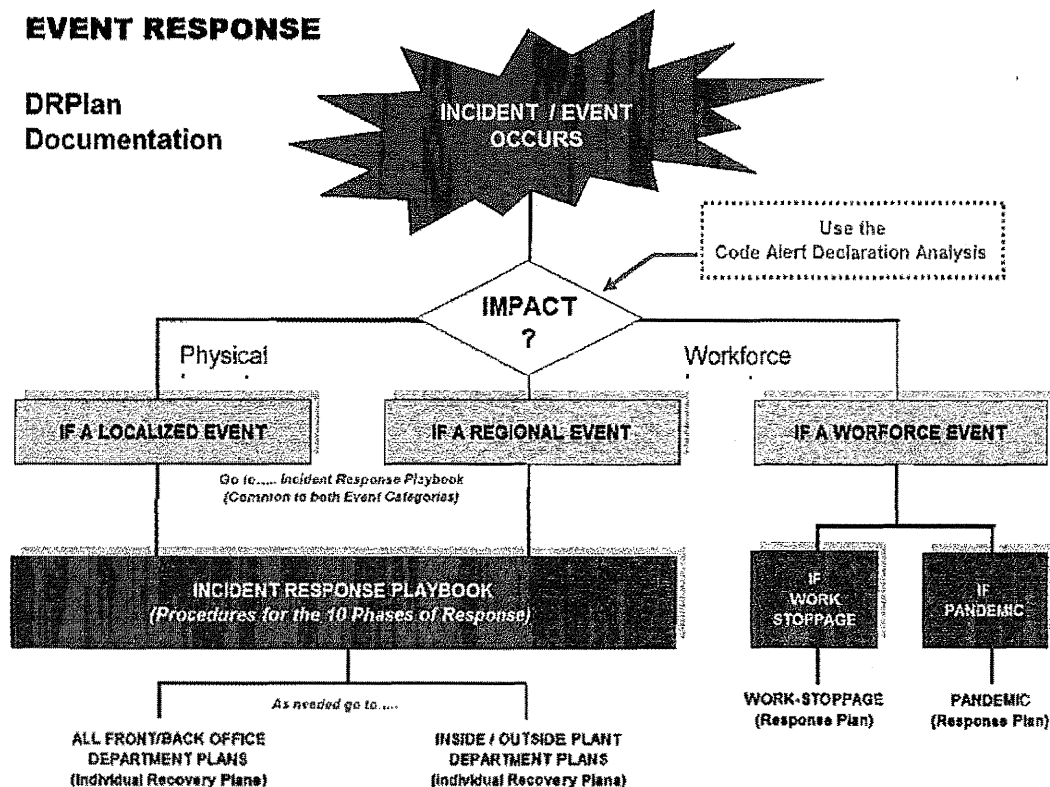
- The BCP Manual (an overview of all BCP documents)
- IR Playbooks (addresses the response procedures for Physical and Workforce related events),
- Appendices (the IR Playbook procedures links to these Resources Files)
- Department Recovery Plans (Business and Plant Operations)
- Business Impact Assessments (Business and Plant Operations)

The Event Response diagram below identifies the overall BCP documentation and how a disruption or incident will dictate which path of the BCP will be followed to restore business operations.

Once the incident or disruption occurs, the impact first needs to be quickly assessed to determine whether it is a physically disruptive event (local or regional) ("Physically Disruptive Event") or a workforce disruptive event (work-stoppage or pandemic) ("Work-Force Related Disruptive Event"). The disruption is always focused on critical business operations and services that can impact customer interfacing / deliverables.

## EVENT RESPONSE

### DRPlan Documentation



### Recovery Strategies and Logistics

Our BCP is based on the premise that FairPoint cannot stop disasters from occurring, but we can address the IMPACT of incidents should they occur. Where possible we will provide risk mitigation measures that will minimize the likelihood of having a serious disruptive incident but in no case can we eliminate all disruptive possibilities. The BCP is triggered by a Disruption Scenario, not a Threat Scenario. FairPoint pre-plans for potential break-points that can result in a customer interfacing disruption and incorporates recovery strategies that will inherently address any potential threat and any resulting business disruption impact. The actual threat (i.e. fire, flood, etc.) is pertinent only with respect to immediate response activities. All subsequent response efforts are focused on the assessment of damages (physical losses and recovery duration) and the implementation of restoration and recovery strategies. The restoration of the business servicing operations and infrastructure systems is based on salvage, replacement of systems and alternate functionality measures, which are pre-defined in the BCP.

Each department has developed a recovery plan based on its critical operations as they pertain to the deliverables they contribute to our customers. FairPoint has triaged the recovery efforts based on the concept of customer servicing impact. Federal and State regulatory requirements have a high level of consideration in



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addition to the business impact concerns. The BCP goal is to minimize the disruption duration as much as is practical and provide a level of risk mitigation that will maintain critical operations.

The Ten Response Phases of Physical Event are:

- Incident Notification
- Visual Damage Assessment
- Incident Stabilization
- Command Center Initiation
- Initial Notifications to Business Departments – to activate plans
- Primary Site Damage Assessments
- Ready Alternate Restoration Sites
- Primary Site Salvage & Recovery
- Business Restoration Process
- Primary Site Re-established

#### **Plan Maintenance and Exercising**

The BCP is a living document. Updates to the plan are ongoing with changes incorporated annually at a minimum. Individual plan components are scenario tested with oversight from FairPoint's Corporate Risk Management Team.

Orwell Telephone Company provides a Lifeline Program discount for residence service for eligible low income customers. The Lifeline Program discount is applied to any month to month residence local service, package or bundle offering. The discount is intended to offset the Subscriber Line Charge and local line charge, although eligible packages and bundles may have toll calling included in the pricing for the offering.

The tariff page outlining the terms of the Lifeline Program in Orwell Telephone Company is attached. The terms and conditions of residential basic local exchange service, package and bundle offerings can be found at <http://www.tariffs.net/fairpoint/tier.asp?cid=1644>.

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LIFELINE REQUIREMENTS

(T)

The Company shall provide Lifeline service as defined in 47 C.F.R. § 54.401(a) on a non-discriminatory basis to all qualifying low-income customers. The Company's Lifeline service offering shall comply with all applicable federal and state laws, including, but not limited to, 47 C.F.R. Part 54, Subpart E; the FCC's Lifeline reform order (Report and Order released February 6, 2012, WC Docket No. 11-42, et.al) and any subsequent clarifying orders; Section 4927.13, Revised Code; Rule 4901:1-6-19, Ohio Administrative Code; and the Commission's nontraditional Lifeline service order (Finding and Order adopted May 23, 2012, Case No. 10-2377-TP-COI) and any subsequent entries and/or orders

(N)

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Issued: June 11, 2012

Effective: June 11, 2012

In Accordance with Case No. 90-5033-TP-TRF  
Issued by the Public Utilities Commission of Ohio  
Patrick L. Morse, Senior Vice President  
Orwell, Ohio

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**10/15/2013 8:23:02 AM**

**in**

**Case No(s). 13-1115-TP-COI**

Summary: Report FCC Form 481 electronically filed by Ms. Teresa L Thomas on behalf of  
Orwell Telephone Company