

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 Pattersonville Telephone Company ("Pattersonville") please find an original and three (3) copies of a Motion for Protective Order and Memorandum in Support pursuant to the Commission's regulations at 4901-1-24(D) of the Ohio Administrative Code. As set forth more fully in the enclosed documents, this Motion is filed with respect to company financial results required in "Rate of Return Carrier Additional Information" section contained within the Federal Communications Commission's Form 481.

Redacted public versions of Pattersonville's Form 481 will be or have been electronically filed with the Commission. Three (3) unredacted copies of the confidential information are also enclosed herewith for filing under seal with each page containing Confidential Information so marked.

Pattersonville requests that you certify to the FCC, as required by 47 C.F.R § 54.314, by the deadline of December 16, 2013 that Pattersonville 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

cc: Marianne Townsend (confidential version)

¹ The financial reports section of FCC Form 481 is identified at the Universal Service Administrative Company ("USAC") website as "Section 3005" in the downloadable version and as "Section 3000" in the online filing version at the same USAC website. http://www.usac.org/hc/tools/forms.aspx. The same identical financial information is required in both. The request for confidentiality applies regardless of whether the form submitted employs the 3005 or 3000 designation.

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<015>	Study Area Name	Pattersonville Telephone Company - OH	
<020>	Program Year	2014	
<030>	Contact Name: Person USAC should contact with questions about this data	Matt Mumma	36 1
<035>	Contact Telephone Number: Number of the person identified in data line <030	610-928-3913 >>	
<039>	Contact Email Address: Email of the person identified in data line <030>	mmumma@icorellc.com	
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<100>	Service Quality Improvement Reporting	(complete attached work	(check box when complete)
<200>	Outage Reporting (voice)	(complete attached work	sheet)
<210>	✓ < check box i	f no outages to report	
	Unfulfilled Service Requests (voice)	0	✓
<310>	Detail on Attempts (voice) Unfulfilled Service Requests (broadband)	0006510H310 (attach descriptive docu	ment)
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<510>	3006510H510	(attached descriptive docu	
<600>	Functionality in Emergency Situations	(check to indicate certific	ation)
<610>	300651OH610	(attached descriptive docu	ment)
<700> <710>	Company Price Offerings (voice)	(complete attached work	
<800>	Company Price Offerings (broadband) Operating Companies and Affiliates	(complete attached works	
<900>	Tribal Land Offerings (Y/N)?	(complete attached work: (if yes, complete attached work:	
<1000>	Voice Services Rate Comparability	(check to indicate certific	12.75 74.75 74.75
<1010>		(attach descriptive docu	ment)
	Terrestrial Backhaul (Y/N)?	(if not, check to indicate certific	ation)
<1110>	Terms and Condition for Lifeline Customers	(complete attached works	A THE RESIDENCE OF THE
12007	Terms and condition for the line customers	(complete attached works	sheet)
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(900) Tribai Lands Reporting Dara Collection Form	Study Area Code	Study Area Name	Program Year	Contact Name - Person USAC should contact regarding this data	Contact Telephone Number - Number of p	Contact Email Address - Email Address of	Tribal Land(s) on which ETC Serves				indal Government Engagement Obligation	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:		Needs assessment and deployment planning with a focus on Tribal community anchor institutions;	Feasibility and sustainability planning;	Marketing services in a culturally sensitive manner;	Compliance with Rights of way processes Compliance with Land Hea parmitting requirements	Compliance with Facilities Siting rules	Compliance with Environmental Review processes	Compliance with Cultural Preservation review processes
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<010>	Study Area Code	300651	
<015>		Pattersonville Telephone Company - OH	
<020>	Program Year	2014	
<030>	Contact Name - Person USAC should contact regarding this data	Matt Mumma	
<032>	Contact Telephone Number - Number of per	ne <030> 610-928-3913	
<039>	Contact Email Address - Email Address of person identified in data line <030>	ine <030> mmumma@icorellc.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)		

10/14/2013

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<010>	> Study Area Code	30051	
<015>	> Study Area Name	Pattersonville Telephone Company - OH	
<020>	> Program Year	2014	
<030>	 Contact Name - Person USAC should contact regarding this data 	Matt Munma	
<032>	Contact Telephone Number - Number of pers	610-928-3913	The control of the co
<039>	 Contact Email Address - Email Address of person identified in data line <030> 	munuma@icorellc.com	
<1210	<1210> Terms & Conditions of Voice Telephony Lifeline Plans		
		Name of attached document (.pdf)	
<1220>	> Link to Public Website HTTP_		
	"Please check these boxes below to confirm that the attached PDF,		
	on line 1210, or the website listed, on line 1220,		
	Contains the required intotalisation pursuant to 3 54.400(s)(2) annual reporting for ETCs receiving four-income		
	support, carriers must annually report:		
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<1221>	.> Information describing the terms and conditions of any voice telephony sended alone of the lifeline subscribers		
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<1222>	> Details on the number of minutes provided as part of the plan,		
<122:	<1223> Additional charges for toll calls, and rates for each such plan.		

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(2000) Price Cap Carrier Additional Documentation Data Collection Form Including Rate-of Return Corriers of filliated with Price Cap Local Exchange Condess	Study Area Code 300651		: - Person USAC should contact regarding this data	in data line <030>	Contact Email Address - Email Address of person identified in data line <030> mmumm	инимствиния вывисителения в рестріент об Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase I support of this form and in the documents attached below is accurate.	Incremental Connect America Phase I reporting	2nd Year Certification (47 CFR § 54.313(b)(1))	Sta real Certification (47 CFK & 54.513(0)(2))	Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)}	2013 Frozen Support Certification	2014 Frozen Support Certification	2015 and future Frozen Support Certification	Price Cap Carrier Connect America (CS Support (47 CFR § 54.313(d))	Certification Support Used to Build Broadband	Connect America Phase II Reporting (47 CFR § 54.313(e))	3rd year Broadband Service Certification	5th year Broadband Service Certification	Interim Progress Certification	Please check the box to confirm that the attached PDF, on line 2021,	Contains the regulied information pursuant to 9 24.513 (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.	Interim Progress Community Anchor Institutions	
(2000) Price Cap Carrie Data Collection Form Including Rate-of-Retur	<010> St	<015> St	<030> Cc	- 1	<039> Cc	emmercenses		\$010\$ \$10\$			<2012>	<2013>	<2014>		<2016>	පී	<2017>	<2018>	<2019>	<2020>				<2021>	

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		Pattersonville Telephone Company - OH	Natt Misses	610-928-3913	mmumma@icorellc.com	DEDITIONS OF THE PROPERTY OF THE PROPERTY OF THE STATE OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE P It is the year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the f CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate,		Name of Attached Document Listing Required Information		Name of Attached Document Listing Required Information				Name of Attached Document Listing Required Information							Name of Attached Document Listing Required Information
	Study Area Code 300651	ame	Program Year Contact Name - Person IISA should contact representation this data.	ta line <030	Contact Ernail Address - Email Address of person identified in data line <030>	NUMER OF THE POWER DISTRICT OF THE PART OF	Progress Report on 5 Year Plan	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 [#[J.][ii], as a recipient of CAF Phase II support shall provide the number, narnes, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year:	Community Anchor Institutions (47 CFR § 5.4.313(f)(1)(ii)	s you company is rowed with an Am Latter (17 C. FT 3-3.3.13) [K. J.	regulas. Estronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)	PDF of Balance Sheet, Income Statement and Statement of Cash Flows	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation 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	: Ethor a copy of their audited financial statement, or [2] a financial report in a format comparable to RUS Operating Report for Telecommunications PDF of Balance Sheet, Income Statement and Statement of Cash Flows	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), conclains: Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a finant comparable to RUS Operating Report for Telecommunications	Continues, Underlying information subjected to a review by an independent certified bublic accountant Underlying information subjected to an officer randiture.	PDF of Babnce Sheet, Income Statement and Statement of Cash Flows	Attach the worksheet listing required information
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<035>	Contact Telephone N	Number - Number of person identified in data line <030> 610-928-3913
<039>		ss - Email Address of person Identified in data line <030> mmumma@icorellc.com

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

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: Pattersonville Telephone Compar	1у - ОН				
Signature of Authorized Officer: CERTIFIED ONLINE		Date			
Printed name of Authorized Officer:					
Title or position of Authorized Officer:					
Telephone number of Authorized Officer:					
Study Area Code of Reporting Carrier: 300651	Filing Due Date for this form: 10/15/20:	13			

Certificat Data Col	lon: Agent / Carrier ection form			100	FCCFor	1 484	7-7-1VID-2-1-1-1N	
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<035>	Contact Telephone Numb	er - Number of person identified in a	data line <030> 610-928-	3913				
<039>	Contact Email Address - E	mail Address of person identified in	data line <030> mmumma@	icorella.com	l		Wa	

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				
I certify that (Name of Agent) also certify that I am an officer of the reporting carrier; my responsibilities includ agent; and, to the best of my knowledge, the reports and data provided to the au	is authorized to submit the information reported on behalf of the reporting carrier. I le ensuring the accuracy of the annual data reporting requirements provided to the authorized thorized agent is accurate.			
Name of Authorized Agent:				
Name of Reporting Carrier: Pattersonville Telephone Company - OH				
Signature of Authorized Officer: CERTIFIED ONLINE	Date;			
Printed name of Authorized Officer:				
Title or position of Authorized Officer:				
Telephone number of Authorized Officer:				
Study Area Code of Reporting Carrier: 300651 Filing	g Due Date for this form: 10/15/2013			
Persons willfully making false statements on this form can be punished by fine or forl under Title 18 of the Ur	feiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment niked 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				
, 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 provide 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: Pattersonville Telephone Company - OH				
Name of Authorized Agent or Employee of Agent: ICORE				
Signature of Authorized Agent or Employee of Agent: CERTIFIED ONLINE Date:				
Wrinted name of Authorized Agent or Employee of Agent: Christoher Ulmer				
itle or position of Authorized Agent or Employee of Agent Manager				
Felephone number of Authorized Agent or Employee of Agent: 610-928-3903				
Study Area Code of Reporting Carrier: 300651 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

LINE 310

Company Study Area Code Supplemental Data For: Pattersonville Telephone Company 300651

Line 310 – Unfulfilled Voice Telephony Service Requests Resolution

Because there were no unfulfilled initial requests for service in the prior calendar year, this line is not applicable. No action plan was needed since all requests for service were fulfilled.

LINE 510

RATES AND RATE STABILITY

New customers are provided rate information at the time they order service. The rate information is prepared based on tariffs which are on file with the state public utility commission and available for inspection at our office. In addition rates are available on the company website. Notices of rate changes proposed by the Company are communicated to the customers through a bill notice or other comparable means. The Company complies with all state and federal rules applicable to rate changes.

PROVIDE SPECIFIC DISCLOSURES IN ADVERTISING

In advertising of prices for service plans the Company will disclose material charges and conditions related to the advertised prices and services. This notice will provide the potential customer with , including if applicable and to the extent the advertising medium reasonably allows: (1) whether nonrecurring installation charges would apply; (2) the monthly fee associated with the service; (3) whether any additional taxes, fees or surcharges apply; (3) the terms and conditions related to receiving a product or service for "free;" and (4) whether prices or benefits apply only for a limited time or promotional period and, if so, whether any different fees or charges will apply for the remainder of the contract term.

TRUTH-IN-BILLING

The Company has long maintained compliance with the FCC's Truth-in-Billing rules as set forth in 47 CFR 64.2401. In part, this requires the Company's telephone bill must: (1) be accompanied by a brief, clear, non-misleading plain language description of the service or services rendered; (2) identify the service provider associated with each charge; (3) clearly and conspicuously identify any change in

Supplemental Data For:

Line 510 - Service Quality Standards and Consumer Protection

Rules Compliance

service provider; (4) contain full and non-misleading descriptions of charges; (5) identify those charges

for which failure to pay will not result in disconnection of the customer's basic local service; and (6)

provide a toll free number for customers to call in order to lodge a complaint or obtain information.

Customers' bills will distinguish (1) monthly charges for service and features, and other charges

collected and retained by the carrier, from (2) taxes, fees and other charges collected by the carrier and

remitted to federal state or local governments. The Company will not label cost recovery fees or charges

as taxes.

PROVIDE READY ACCESS TO CUSTOMER SERVICE

Customers and potential customers may access customer service by visiting the Company's

office or by using a toll-free telephone number during normal business hours. Customer service contact

information is available at our business office with regular hours posted on the storefront. In addition,

this information is available online and on the monthly invoice rendered by the company.

ABIDE BY POLICIES FOR PROTECTION OF CUSTOMER PRIVACY

The Company complies with all state and federal rules regarding the privacy of customer

information. Certification of this compliance is provided annually to the FCC.

RESPONSE TO CONSUMER INQUIRIES AND COMPLAINTS RECEIVED FROM GOVERNMENT AGENCIES

The Company will respond in writing to state or federal administrative agencies within 30 days

of receiving written consumer complaints from any such agency. Should the agency require a shorter

interval for response, the Company will use its best efforts to expedite the review of the complaint to

provide a response which meets the agency-provided target date.

Company Study Area Code Supplemental Data For: Pattersonville Telephone Company 300651

Line 510 – Service Quality Standards and Consumer Protection Rules Compliance

TERMINATION OF SERVICE

The Company follows the state public utility commission's rules for termination of service.

Service cannot be terminated without advance notice to the customer. If service is being terminated for non-payment, the customer will have the option to establish a payment plan. So long as the customer adheres to the payment plan, service will not be disconnected.

Customers may terminate service at any time and for any reason. The Company does not assess any termination penalty and the customer is simply required to pay for the services which were used while the service was provided.

LINE 610

300651

<u>Line 610 – Description of Functionality in Emergency Situations</u>

As an initial point, the Company had no service outages during 2012 which met the FCC's threshold for reporting into the Network Outage Reporting System ("NORS").

The Company engages in preventative maintenance programs which help ensure network reliability in all conditions. This includes regular checks on generators, battery back-up, HVAC infrastructure at central office switches, and tree trimming/removal when trees have the potential to take down telephone lines during events of high wind or heavy snow. Access to critical infrastructure (like central office switches) is limited to essential personnel. Spare equipment is maintained in inventory.

Like most local exchange carriers, the Company's network consists of electronic switching equipment and a network of fiber optics and copper facilities. From a switching standpoint, the Company has one primary switch and smaller switches which are fed by the primary switch. These smaller switches are often referred to as intraexchange remote switches or concentrators. The largest threat to switches is the loss of power. To address this, the Company ensures adequate battery back-up is maintained. For emergency situations which extend beyond the useful life of the battery back-up, the Company uses generators to power the switches. These generators are portable which ensures they can be relocated to any switching center based on the specific needs of each switch. In addition, the Company's office will serve as a Command and Control center. This center is included as a primary location to which continuous power is required.

In cases of emergency, the Company's management has contact information for all employees. Depending upon the scope of the emergency, the Company may call-in as many employees as necessary to provide continual telecommunications service. The Company has access to local and regional construction companies which can be called in to supplement the work force if necessary. When poles are down from emergencies, the Company works with other utilities attached to the same poles to expedite the repair or replacement of the infrastructure.

In summation, the Company takes preventative measures to plan for emergency situations and also takes steps to mitigate the risk or duration of such events.

LINE 3026 REDACTED

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