September 29, 2015

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW, Room TW-A306  
Washington, DC 20554

Re: Annual State Certification of Support for Rural and Non-Rural High-Cost Carriers  

Dear Ms. Dortch:

I represent the Public Utilities Commission of Ohio (“Ohio Commission”) in this proceeding and I am writing to you in that capacity.

Accompanying this letter is a copy of a Finding & Order issued by the Ohio Commission on September 25, 2014 (Attachment 1). By this Finding & Order, the Ohio Commission certifies that all universal service high cost and Connect America Funds flowing to carriers in this state will be used “only for the provision, maintenance, and upgrading of facilities and services for which the support is intended” in a manner consistent with section 254(e) of the Communications Act of 1934, as amended.

As you can see from the attached Order, the Ohio carriers previously identified by the Universal Service Administrative Company (USAC) as eligible to receive federal USF support have filed sworn affidavits with the Ohio Commission demonstrating their intent to use funding in a manner consistent with Section § 254(e) of the Communications Act of 1934, as amended. The Order further demonstrates that these affidavits certify that all federal high-cost and Connect America Fund support was used in the preceding year, and will be used in the coming calendar year, for the provision, maintenance, and upgrading of facilities and services for which the support is intended, regardless of the rule under which that support is provided. This certification was requested pursuant to section 54.314 of the FCC's rules (47 C.F.R. §54.314).

Finally, Attachment 2 is a list of carriers certified by the Ohio PUC pursuant to sections 54.313 and 54.314 of the FCC’s rules (47 C.F.R. § § 54.313, 54.314), which requires states to establish an annual certification process for carriers receiving federal high cost support. As requested by the Universal Service Administrative Company, listed beside each carrier is its unique assigned 6-digit NECA study area code (SAC), if known.

Accordingly, the Ohio Commission certifies that all of the above-referenced carriers have indicated in writing that all such funding during the previous year (2014) was used, and that all
such funding in the upcoming year (2016) will be used, only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, consistent with § 254(e) of the Communications Act of 1934, as amended.

Please acknowledge timely receipt of this letter. Otherwise, if you should have any questions or comments regarding this submittal, please contact me at the number below or Jason Well with the PUCO at (614) 644-8032.

Respectfully submitted,

/s/Werner L. Margard
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Enclosures
cc:  Karen Majcher, USAC