June 16, 2015

REDACTED – FOR PUBLIC INSPECTION

Marlene H. Dortch, Secretary
Federal Communication Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Re: Confidential Financial Information Subject to Protective Order in WC Docket Nos. 14-58,
07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WT Docket
Form 481 – Carrier Annual Reporting Data Collection, 2015

Dear Ms. Dortch:

On behalf of Arctic Slope Telephone Association Cooperative, Inc. (“ASTAC”) (dba ASTAC Wireless
LLC-SAC 619010), GVNW Consulting, Inc. hereby submits the attached redacted and confidential
versions of its “FCC Form 481 – Carrier Annual Reporting Data Collection” information pursuant to
sections 54.313 and 54.422 of the Commission’s rules, as filed with the Universal Service Administrative
Company. A copy is also being submitted to the Public Utility Commission of Alaska.

ASTAC requests confidential treatment pursuant to sections 0.457 and 0.459 of the Commission’s rules
for those items in the annual Board Meeting Minutes not related to the Tribal Engagement Obligation
required by section 54.313(a)(9). As a matter of policy, the information contained in the Board Meeting
Minutes is only available to the membership of the Cooperative, not the general public.

In accordance with the Protective Order, two redacted copies marked “REDACTED – FOR PUBLIC
INSPECTION” and one non redacted confidential version marked “CONFIDENTIAL – NOT FOR
PUBLIC INSPECTION” are being filed with the Commission. A redacted copy has also been filed via
the Electronic Comment Filing System.

If you have any questions, please contact me at 503-612-4418.

Sincerely,

Ken Snow
GVNW Consulting, Inc.

Enclosures
cc: Mr. Charles Tyler, FCC Telecommunications Access Policy Division (two copies, confidential)
    J. Smith, GVNW
Service Quality Improvement Reporting
Outage Reporting (voice)
Unfulfilled Service Requests (voice)
Detail on Attempts (voice)
Unfulfilled Service Requests (broadband)
Detail on Attempts (broadband)
Number of Complaints per 1,000 customers (voice)
Faxed
Mobile
Number of Complaints per 1,000 customers (broadband)
Faxed
Mobile
Service Quality Standards & Consumer Protection Rules Compliance
Functionality in Emergeny Situations
Company Price Offerings (voice)
Company Price Offerings (broadband)
Operating Companies and Affiliates
Tribal Land Offerings (V/NI)
Voice Services Rate Comparability Certification
Certify whether terrestrial backhaul options exist (Yes or No)
Terms and Condition for Lifeline Customers
Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet
Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers
Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet
<table>
<thead>
<tr>
<th>State</th>
<th>Exchange (EIXC)</th>
<th>SAC (EIXC)</th>
<th>Rate Type</th>
<th>Residential Local Service Rate</th>
<th>State Subscriber Line Charge</th>
<th>State Universal Service Fee</th>
<th>Mandatory Extended Area Service Charge</th>
<th>Total per Line Rates and Fees</th>
</tr>
</thead>
</table>

--- See attached worksheet ---

Residential Local Service Charge Effective Date: 5/1/2016
Single State-wide Residential Local Service Charge: $22.99
<table>
<thead>
<tr>
<th>Affiliates</th>
<th>SAC</th>
<th>Doing Business As Company or Brand Designation</th>
</tr>
</thead>
</table>

See attached worksheet
<010> Study Area Code
C1255

<015> Study Area Name
NETAC Wireless LLC - CB

<020> Program Year
2018

<090> Contact Name - Person USAC should contact regarding this data
Clever McHill

<035> Contact Telephone Number - Number of person identified in data line<br>8075641240 ext.

<038> Contact Email Address - Email Address of person identified in data line<br>CleverMcHill@att.com

<810> Tribal Land(s) on which ETC Serves
NORTH SLEPE BOROUGH

<920> Tribal Government Engagement Obligation

If your company serves Tribal lands, please select (Yes, No, NA) for each box to confirm the status described on the attached document(s). 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 use permitting requirements
- Compliance with Facilities Siting rules
- Compliance with Environmental review process
- Compliance with Cultural Preservation review processes
- Compliance with Tribal Business and Licensing requirements.

Select<br>Yes or No or <br>Not Applicable

Name of Attached Document
635811095492 .pdf
<table>
<thead>
<tr>
<th>&lt;801&gt; Study Area Code</th>
<th>419012</th>
</tr>
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<tbody>
<tr>
<td>&lt;805&gt; Study Area Name</td>
<td>MISO Wireless 2AC - CT</td>
</tr>
<tr>
<td>&lt;810&gt; Program Year</td>
<td>2016</td>
</tr>
<tr>
<td>&lt;810&gt; Contact Name - Person USAC should contact regarding this data</td>
<td>Glover Rochal</td>
</tr>
<tr>
<td>&lt;815&gt; Contact Telephone Number - Number of person identified in data line &lt;810&gt;</td>
<td>970-684-8488 ext.4</td>
</tr>
<tr>
<td>&lt;819&gt; Contact Email Address - Email Address of person identified in data line &lt;810&gt;</td>
<td>Gloverrochal.net</td>
</tr>
</tbody>
</table>

**Please confirm whether terrestrial backhaul options exist within the supported area pursuant to § 54.313(g) (Yes, No).**

[Blank]

**Please select the appropriate response (Yes, No, Not Applicable) 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).**

[Blank]
<table>
<thead>
<tr>
<th>Field</th>
<th>Value</th>
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</thead>
<tbody>
<tr>
<td>Study Area Code</td>
<td>619510</td>
</tr>
<tr>
<td>Study Area Name</td>
<td>MOBILE WIRELESS LLC - OK</td>
</tr>
<tr>
<td>Program Year</td>
<td>2016</td>
</tr>
<tr>
<td>Contact Name - Person USAC should contact regarding this data</td>
<td>Glenn Welti3</td>
</tr>
<tr>
<td>Contact Telephone Number - Number of person identified in data line</td>
<td>9795646444  ext.</td>
</tr>
<tr>
<td>Contact Email Address - Email Address of person identified in data line</td>
<td><a href="mailto:GWeiti@USAC.net">GWeiti@USAC.net</a></td>
</tr>
</tbody>
</table>

**<1210> Terms & Conditions of Voice Telephony Lifeline Plans**

*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:

- Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers: [ ]
- Details on the number of minutes provided as part of the plan: [ ]
- Additional charges for toll calls, and rates for each such plan: [ ]

Name of Attached Document: [ ]

<table>
<thead>
<tr>
<th>Link to Public Website</th>
<th>HTTP</th>
</tr>
</thead>
<tbody>
<tr>
<td>[ ]</td>
<td><a href="http://www.usac.net">www.usac.net</a></td>
</tr>
</tbody>
</table>

Page 9
<table>
<thead>
<tr>
<th>Study Area Code</th>
<th>Study Area Name</th>
<th>Program Year</th>
<th>Contact Person - Name</th>
<th>Contact Telephone Number</th>
<th>Contact Email Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>AMERICAS WHEELER</td>
<td>2014</td>
<td></td>
<td></td>
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<td></td>
</tr>
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Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental Connect America Phase I support from High Cost support.

- Incremental Connect America Phase I reporting
- 2012 Certification (47 CFR § 54.313(a)(3))
- 2013 Certification (47 CFR § 54.313(b)(3))
- 2014 Certification (47 CFR § 54.313(c)(4))
- 2015 Certification (47 CFR § 54.313(d)(4))
- 2016 Certification (47 CFR § 54.313(e))
- 2017 Certification (47 CFR § 54.313(f))
- 2018 Certification (47 CFR § 54.313(g))
- 2019 Certification (47 CFR § 54.313(h))

The information reported on this form and the documents attached below is accurate.

<table>
<thead>
<tr>
<th>Price Cap Carrier Receiving Phase Support Certification (47 CFR § 54.313(b))</th>
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<tbody>
<tr>
<td>2013 FSSR Support Certification (47 CFR § 54.313(c)(1))</td>
</tr>
<tr>
<td>2014 FSSR Support Certification (47 CFR § 54.313(c)(2))</td>
</tr>
<tr>
<td>2015 FSSR Support Certification (47 CFR § 54.313(c)(3))</td>
</tr>
</tbody>
</table>

*Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.315(e)(6)(i) as a recipient of CAF II support shall provide the names, addresses of community anchor institutions to which the access to broadband service in the preceding calendar year.*
Financial Data Summary

(3027) Revenues
(3028) Operating Expenses
(3029) Net Income
(3030) Telephone Plant in Service (TPS)
(3031) Total Assets
(3032) Total Debt
(3033) Total Equity
(3034) Dividends

Name of Attached Document Listing Required Information
TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

<table>
<thead>
<tr>
<th>Study Area Code</th>
<th>612010</th>
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<tbody>
<tr>
<td>Study Area Name</td>
<td>ABNCO Wireless LLC - 05</td>
</tr>
<tr>
<td>Program Year</td>
<td>2016</td>
</tr>
<tr>
<td>Contact Name</td>
<td>Oliver Nibali</td>
</tr>
<tr>
<td>Contact Telephone Number</td>
<td>9876543210 ext.</td>
</tr>
<tr>
<td>Contact Email Address</td>
<td><a href="mailto:oliver@nibali.com">oliver@nibali.com</a></td>
</tr>
</tbody>
</table>

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 entity, 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: ABNCO Wireless LLC - 05

Signature of Authorized Officer: [Signature]  Data: 04/11/2018

Printed name of Authorized Officer: Oliver Nibali

Title or position of Authorized Officer: CFO

Telephone number of Authorized Officer: 9876543210 ext.

Study Area Code of Reporting Carrier: 612010

Date Due Date for this Form: 07/01/2015

Penalties for willful making false statements on this form can be punished by fine or imprisonment under the Communications Act of 1934, 47 U.S.C. §§ 605, 607(a), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.
Attachments
<table>
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<tr>
<th>State</th>
<th>Exchange (LEC)</th>
<th>SAC [EXIT]</th>
<th>Rate Type</th>
<th>Residential Local Service Rate</th>
<th>State Subscriber Line Charge</th>
<th>State Universal Service Fee</th>
<th>Mandatory Extended Area Service Charge</th>
<th>Total per Line Rates and Fees</th>
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<td>0.0</td>
<td>2.34</td>
<td>0.0</td>
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<tr>
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<td>Atgasuak</td>
<td>FF</td>
<td>PE</td>
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<td>Barrow</td>
<td>FF</td>
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<tr>
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<td>FF</td>
<td>PE</td>
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<td>Affiliate</td>
<td>SAC</td>
<td>Doing Business As Company or Brand Designation</td>
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<td>Arctic Slope Telephone Association Cooperative, Inc.</td>
<td>61361</td>
<td>ASTAC, Arctic Slopes Tel (HCL, ICLS, LSS, YCC)</td>
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<td>ASTAC, ASTAC Wireless (HCL, ICLS, LCC)</td>
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<td>Ningiq, LLC</td>
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</tbody>
</table>
54.313(a)(5) Satisfactions of Consumer Protection and Service Quality Standards

Consumer Protection

Voice
Arctic Slope Telephone Association Cooperative, Inc. complies with the requirements of 47 CFR Part 64 Subpart U, Customer Proprietary Network Information and the Federal Trade Commission Red Flag rules to prevent identity theft. A manual for each of those programs is in place and is part of the employees' handbook. Employee training is conducted annually and new hires are instructed on the programs as required by their job functions. This applies to all lines of business (voice, broadband, wireless and lifeline).

Service Quality Standards

Voice
Arctic Slope Telephone Association Cooperative, Inc. complies with the service standards of the State of Alaska promulgated in Alaska Statutes, Title 3 Commerce, Community, and Economic Development Part 7 Regulatory Commission of Alaska, 9 AAC 52.200-3, 9 AAC 52.340, Telephone Utilities and Alaska Administrative Code 9 AAC 53.700 State Telecommunications Modernization. This applies to all lines of business (voice, broadband, wireless and lifeline).
Functionality in Emergency Situations

In 7 of our village locations (Point Hope, Point Lay, Wainwright, Atqasuk, Nuiqsut, Kaktovik and Anaktuvuk Pass) we have fully redundant Redcom local exchange switches. The central offices that these switches are installed in are equipped with back up batteries designed to support an 8 hour power disruption. In addition, each location has a standby generator that will come on line automatically in the event of the loss of commercial power. These generators are equipped with external fuel tanks that will provide for 4 or 5 days of unattended operation. We have village reps in these villages that can check the site during an emergency and have fuel delivered if necessary.

In our two largest exchanges, Barrow and Deadhorse we have fully redundant DMS 10 local exchange switches. The central offices these switches are installed in are equipped with back up batteries to support an 8 hour power disruption. In addition, each location has a standby generator that will come on line automatically in the event of loss of commercial power. These generators are equipped with external fuel tanks that will provide for 4 or 5 days of unattended operation. It addition these locations are manned 7 days a week for emergency response.

In both Barrow and Deadhorse we have battery back at all remote locations and any locations without permanent standby generators are supported by portable generators.

In all locations we work with the two long distance carriers to reroute traffic as required to recover from network outages or traffic spikes. We have redundant routes to both major carriers.
Arctic Slope Telephone Association Cooperative, Inc.

Certification of Tribal Engagement

For the Year Ending December 31, 2014
Service Area Description: Arctic Slope Telephone Association Cooperative, Inc. (ASTAC) serves the North Slope Region of Alaska. Our service area encompasses over 89,000 square miles and has seven traditional Native villages, the City of Barrow and the oilfields of Prudhoe Bay scattered across that expanse. With the exception of Prudhoe Bay, which is built out from the terminus of the Dalton Highway, all other villages can only be reached year round by aircraft.

Tribal Entities: There are ten federally recognized Tribal Entities within ASTAC's serving area. Each of the seven villages and Barrow has a Native Village organization. Arctic Slope Native Association (ASNA) is the Tribal Entity that manages the Samuel Simmonds Memorial Hospital in Barrow and the Inupiat Communities of the Arctic Slope (ICAS) serves as an "umbrella" government for eight remote Inupiat villages known as the Inupiat "community" spread out along the Arctic Ocean and in the Interior, just above the Arctic Circle.
The Process: Following the guidelines in DA 12-1165, ASTAC's Executive Leadership Team made multiple attempts to either coordinate telephonic meetings for Tribal Engagement or meet the requirement through proxy of the engagement process by the tribal entity to the village's elected Director to the ASTAC Board. Tribal leadership points of contact were updated to reflect current information. A cover letter was created to explain the new process and asking for the Tribal Entity's cooperation in meeting our Tribal Engagement obligations. The cover letter borrowed heavily from DA 12-1165. The cover letter was attached to a Tribal Pre-meeting questionnaire which also extracted the questions from DA 12-1165 for Native leaders to consider prior to the telephonic engagement meeting. These two documents were sent on October 17, 2014. An example of the cover letter and a blank Tribal Pre-meeting Questionnaire can be found at [link].

The cover letter and pre-meeting questionnaire did not elicit a response from any of the Tribal entities who have not asked to be represented by their Tribe's Director on the ASTAC Board. Following the mailing of the first letter, ASTAC had a regularly scheduled Board meeting on October 22d, where the Board approved numerous ongoing engagement items. Minutes for the Open portion of the meeting, including Board approval of engagement activities can be found at [link]. At this same Board meeting, Directors residing in the 5 communities who had been non-responsive to the engagement interaction were asked to do a personal follow up with the Tribal entity and all agreed to do so. The next step in the process was to do a second mailing of the engagement letter on December 10, 2013 with a cover letter reintroducing what we were trying to achieve [link]. Following this mailing, Charlie Carpenter, Chief of Network Operations requested a telephonic meeting. Telephonic logs for each Tribal Entity who did not proxy representation to their elected Director can be found at [link].

Following multiple attempts to engage Tribal Leadership from October through December 2014, we were successful in connecting with 60% (six) of the ten Tribal entities. A recurring theme that was expressed in 2012 through 2014 was the appropriateness of using the ASTAC elected Board member as a representative of many of the Tribal entities, since the Board member is also a member of the Tribal entity, has received telecom specific training, and sets the direction for the Cooperative based on the will of the people who elect them. We received a written request to do so from the Native Villages of Barrow and Walnwright and verbal authorization from the Native Villages of Kaktovik, Nuiqsut, Point Hope, and Anaktuvuk Pass [link].

I certify that the above description of ASTAC's Tribal Engagement is a fair and accurate documentation of our efforts and that a copy of this certification has been provided via USPS to all of our Tribal entities.

Stephen L. Merriam, CEO

December 81, 2014
<table>
<thead>
<tr>
<th>Native Village Tribal Council-Presidents</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Thomas Olemaun</td>
<td>Barrow</td>
</tr>
<tr>
<td>Edward Rexford Sr.</td>
<td>Kaktovik</td>
</tr>
<tr>
<td>Howard Petkotak</td>
<td>Walnwright</td>
</tr>
<tr>
<td>Margaret Perdue</td>
<td>Nul姜st</td>
</tr>
<tr>
<td>Jack Schaffer</td>
<td>Pt. Hope</td>
</tr>
<tr>
<td>Margaret Ahngasak</td>
<td>Atqasuk</td>
</tr>
<tr>
<td>Pres. Village Council</td>
<td>Anaktuvuk Pass Individual stepped down, no one at this time</td>
</tr>
<tr>
<td>Leo Ferreira</td>
<td>Pt. Lay</td>
</tr>
</tbody>
</table>
October 17, 2014

Mr. Howard Patkotak, President
Village of Wainwright
P.O. Box 143
Wainwright, AK 99782

Dear Mr. Patkotak:

This letter is intended to help facilitate engagement between Tribal government officials and ASTAC, which provides service on Tribal lands with the use of Universal Service Fund (USF) support. In 2012, ASTAC met with all tribal entities on the North Slope. Based on feedback we received from Tribal leadership, we are amending our process to better collaborate with you.

A number of tribal entities pointed out that ASTAC has an elected Director to our Board representing your community. All Directors receive extensive industry training in telecommunications, meet four times yearly to set direction for the Cooperative and could potentially be a great resource in directing the Cooperative relative to your planning. It was highly suggested that the Director coordinate with you and speak for your tribal entity, engaging the Cooperative management team on your behalf. This would be much more responsive to your evolving needs due to the quarterly standing Board meetings where you could be represented. It would also save the membership a significant amount of money. For instance, in-person tribal engagement in 2012 cost the Cooperative almost $28,000.

Five of the ten tribal entities for the North Slope have adopted this approach in 2013, saving the membership significant money better used to upgrade the network for future offerings.

If this alternative approach makes sense to you, please email me at steve@astac.net and confirm your interest in using our Board member as your organization’s representative for telecommunications issues, and we will take it from there. Thanks for your consideration of this tailored approach.

Best Regards,

Stephen Merriam, CEO
ASTAC, Serving the North Slope of Alaska since 1980