

# RECEIVED

AUG 10 2007 PUBLIC SERVICE COMMISSION

August 9, 2007

Beth O'Donnell - Executive Director Kentucky Public Service Commission 211 Sower Blvd. P.O. Box 615 Frankfort, KY 40602-0615

Re: PSC Case No 381

This letter is to request that the Kentucky Public Service Commission notify the Federal Universal Fund Administrator (USAC) and the Federal Communications Commission (FCC) that Leslie County Telephone Company, Salem Telephone Company and Lewisport Telephone Company d/b/a TDS Telecom are eligible to receive federal universal service support in accordance with the above-referenced statute and federal rule.

The amount of federal universal service the Companies will receive in 2008 will continue to be used for the services and functionality's outlined in 47 C.F.R. Sec.54.101(a) and, as the attached affidavit shows, the Companies all certify that it will use the federal universal service support it receives for the provision, maintenance and upgrading of facilities and service for which such support is intended.

This state certification for federal support will be an annual process. In order to receive federal support beginning January 1 of each year, the Kentucky Public Service Commission must file its annual certification on or before October 1 of the year before.

Leslie County Telephone Company, Salem Telephone Company and Lewisport Telephone Company d/b/a TDS Telecom respectfully requests that the Commission notify the FCC and USAC prior to October 1 of this year that they are eligible to receive federal universal service support for 2008.

Sincerely,

Kustan M. Alasi

Kristine M. Haskin Manager – Federal Affairs TDS Telecom 525 Junction Road, Suite 700S Madison, WI 53717 608.664.4144

525 JUNCTION RD. MADISON, WI. 53717

# COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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A CERTIFICATION OF THE CARRIERS ADMINISTRATIVE RECEIVING UNIVERSAL SERVICE CASE NO. 381 HIGH COST SUPPORT AUG 10 2007 PUBLIC SERVICE COMMISSION

# LESLIE COUNTY TELEPHONE COMPANY D/B/A TDS TELECOM LEWISPORT TELEPHONE COMPANY D/B/A TDS TELECOM SALEM TELEPHONE COMPANY D/B/A TDS TELECOM <u>RESPONSE TO COMMISSION DATA REQUEST</u>

Pursuant to the Commission's August 21, 2001 data request, TDS Telecom submits the following information to demonstrate that federal universal support has been used as intended by the Federal Communications Commission (FCC), consistent with Section 254 (e) of the Telecommunications Act of 1996.

Exhibit 1 - Summary of 2008 USF-HCL & LSS for Leslie County Telephone Company Exhibit 2 - Summary of investments & expense for Leslie County Telephone Company Exhibit 3 - Summary of 2008 USF-HCL & LSS for Lewisport Telephone Company Exhibit 4 - Summary of investments & expense for Lewisport Telephone Company Exhibit 5 - Summary of 2008 USF-HCL & LSS for Salem Telephone Company Exhibit 6 - Summary of investments & expense for Salem Telephone Company

As in prior years, TDS Telecom will utilize the federal universal support payments received in 2008 for the provision, maintenance, and construction of facilities for which the support was intended. These expenditures, those already made and those that will be made in the future, are what the USF payments are meant to support.

Exhibit 2 (Leslie County), Exhibit 4 (Lewisport) and Exhibit 6 (Salem) detail the investments & expenses that have already occurred over the last several years. For a cost company (eg, Leslie County), 12/31/2006 investments & expenses are used in the USF-HCL algorithm to calculate USF-HCL support for 2008. For average schedule companies (eg, Lewisport and Salem) USF support is received under average schedule formulas. Exhibits 2, 4, and 6 illustrate that all three companies have historically

invested in their networks. It is expected that future investment increases will be similar to those displayed on these exhibits.

The expenditures, those already made and those that will be made in the future, far exceed any federal universal support payments received by the TDS Telecom companies. In addition, USF support is already an existing revenue flow. The amounts to be received in 2008 are not significantly different than amounts received in prior years. Therefore, no proposal for reducing intrastate access rates will be submitted.

The attached affidavit signed by Kevin G. Hess, Senior Vice President, Government & Regulatory Affairs, certifies that USF funds have been expended for intended purposes. TDS Telecom respectfully requests the Commission to submit the certification to the FCC on or before October 1, 2007 in order for the companies to receive federal support during 2008.

Respectfully submitted,

Kristine M. Haskin Manager - Federal Affairs

Summary of 2008 USF-HCL & LSS For Leslie County Telephone Company (NECA SAC 260411) Estimated Support Information

Year USF Is Received	Total Estimated Amount For Support Funds	Note	Estimated Federal High Cost Loop (HCL)	Estimated Federal Local Switching Support (LSS)
2008	\$763,716	*1, 2	\$621,840	\$141,876
*1 LSS from NECA Latest V	ttest View File, 07-200*			

\*2 HCL for cost company from most recent filing

Exhibit 2

# for Leslie County Telephone Company Expenses Summary of Investments &

12/31/2005   12/31/2006     4, 708, 563   5, 405, 429     5, 957, 282   6, 258, 493     2, 840, 351   2, 990, 708     17, 045, 888   17, 266, 401     2, 119, 323   2, 244, 146     29, 831, 056   31, 174, 469	112,921 138,133 169,505 133,658 112,038 156,134 634,599 655,017 711,495 722,198 2,041,150 2,036,955 896,787 903,420 1,096,648 1,470,497 (1,248) 1,470,497 (1,248) 1,548,138 7,762,902	38,937,371 \$ 763,716
on (Total) Lit (Incl. In Line 2) .ce	.on (Total)	
Acc # Investment 22** Cental Office Switching 223* Central Office Transmission Central Office Loop Circuit 24** Cable and Wire 21** General Support Total Tel. Plant in Service	Expenses 61** General Support 6212 Central Office Switching 623* Central Office Transmission (Total) 64** Cable and Wire Plant Non Specific 65** Depreciation 65** Depreciation Customer Oper 67** Corporate Oper 67** Corporate Oper 72** Operating Taxes Total Operating Expenses	Total Expenditures Total USF Received

Summary of 2008 USF-HCL & LSS For Lewisport Telephone Company (NECA SAC 260412) Estimated Support Information

Year USF Is Received	Total Estimated Amount For Support Funds	Note	Estimated Federal High Cost Loop (HCL)	Estimated Federal Local Switching Support (LSS)
2008	\$128,900	*1, 2	\$24,668	\$104,232
*1 HCL same as most recent :	recent 200* NECA statements in which no change in HCL is shown for average schedule companies.	change in HCL	is shown for average schedule o	ompanies.

\*2 LSS from NECA Latest View file, 07-200\*

# Summary of Investments & Expenses for Lewisport Telephone Company

12/31/2005 12/31/2006   1,199,548 1,282,974   698,926 725,968   724,410 278,780   2,034,155 2,058,593   608,930 612,741   4,541,559 4,680,276	20,162 25,787 22,152 25,787		49,665 53,329 117,793 132,427		222,109 158,548 160,679 168,292	~		1,086,242 I.094,529	5,774,805	\$ 128,900
Acc # Investment 22** Cental Office Switching 223* Central Office Transmission (Total) Central Office Loop Circuit (Incl. In Line 24** Cable and Wire 21** General Support Total Tel. Plant in Service	Expenses 61** General Support	6212 Central Office Switching 623* Central Office Transmission (Total)	64** Cable and Wire Plant Non Specific	65** Depreciation	Customer Oper 67** Cornorate Oper	other Oper Inc & Exp	72** Operating Taxes	Total Operating Expenses	Total Expenditures	Total USF Received

Summary of 2008 USF-HCL & LSS For Salem Telephone Company (NECA SAC 260417) Estimated Support Information

and the second se	all a state of the
Estimated Federal Local Switching Support (LSS) \$138,756	companies.
Estimated Federal High Cost Loop (HCL) \$0	is shown for average schedule
Note *1, 2	o change in HCL
Total Estimated Amount For Support Funds \$138,756	t recent 200* NECA statements in which no change in HCL is shown for average schedule companies.
γear USF Is Received 2008	
	Total Estimated Amount For Support FundsEstimated Federal Note\$138,756*1, 2\$138,756

\*1 HCL same as most recent 200\* NECA sta \*2 LSS from NECA Latest View file, 07-200\*

Exhibit 6

# Salem Telephone Company for Expenses ა Summary of Investments

12/31/2005 12/31/2006   1,021,873 1,049,744   563,712 588,471   392,524 399,402   3,095,736 3,116,323   626,714 630,542   5,308,035 5,385,080	12,824 12,265 23,577 28,010 8,337 28,010 86,487 86,989 128,363 134,591 325,966 328,317 233,922 203,556 318,600 325,337 (1,140) (1,140) 239,285 221,913 <b>1,376,221 1,379,002</b>	6,164,U82 \$ 138,756
Acc # Investment 22** Central Office Switching 223* Central Office Transmission (Total) 223* Central Office Loop Circuit (Incl. In Line 2) 24** Cable and Wire 21** General Support Total Tel. Plant in Service	Expenses 61** General Support 6212 Central Office Switching 623* Central Office Transmission (Total) 64** Cable and Wire Plant Non Specific 65** Depreciation Customer Oper 67** Corporate Oper 72** Operating Taxes Total Operating Expenses	Total Expenditures Total USF Received

## AFFIDAVIT

STATE OF WISCONSIN ) ) ss. COUNTY OF DANE )

BEFORE ME, the undersigned authority, on this day personally appeared Kevin G. Hess, who on his oath deposed and said:

- My name is Kevin G. Hess. I am employed by TDS Telecommunications Corporation, parent company of Leslie County Telephone Company, Lewisport Telephone Company and Salem Telephone Company all d/b/a TDS Telecom (the Companies) in the position of Senior Vice President, Government & Regulatory Affairs. In this position, I am personally familiar with the Federal Universal Service support received by the Company and how these funds are used by each Company.
- The Companies were designated as an eligible telecommunications carrier by the Kentucky Public Service Commission in Case No. 360 by order dated November 26, 1997.
- 3. Leslie County Telephone Company, Lewisport Telephone Company and Salem Telephone Company all d/b/a TDS Telecom estimate that it will receive \$763,716, \$128,900, and \$138,756 respectively of Federal Universal Service high cost support and local switching support during the January 1, 2008 to December 2008 time period.
- 4. The Federal Universal Service Support funds Leslie County Telephone Company, Salem Telephone Company and Lewisport Telephone Company all d/b/a TDS Telecom will receive during 2008 will be used for the provision, maintenance and upgrading of facilities and services for which the support is intended, as designated by the Federal Communications Commission consistent with Section 254(e) of the Federal Telecommunications Act. These

funds will be used to provide the following supported services, as outlined in 47 CFR § 54.10(a), which are available to any customer in the Company's service area: single-party voice grade access to the public switched network, unlimited local usage, dual-tone multi-frequency signaling or its functional equivalent, access to emergency services, including 911 service or enhanced 9-1-1 service, access to operator service, access to interexchange service and access to directory assistance and toll limitation for qualifying low income customers.

- 5. Leslie County Telephone Company, Salem Telephone Company and Lewisport Telephone Company all d/b/a TDS Telecom follows Federal Communication Commission Part 32 accounting requirements for regulated local exchange carriers and Part 36 separations provisions used to determine high cost support amounts. As a regulated utility, Leslie County Telephone Company's, Salem Telephone Company and Lewisport Telephone Company's all d/b/a TDS Telecom accounting and separations procedures are subject to periodic National Exchange Carrier Association and Kentucky Public Service Commission reviews.
- 6. While continuing to receive the estimated amount of Federal Universal Service support as described and using this support for the purposes as described, Leslie County Telephone Company, Salem Telephone Company and Lewisport Telephone Company all d/b/a TDS Telecom does not anticipate increasing local rates nor withdrawing any services; therefore, the comparability of rates and service between the rural areas served by Leslie County Telephone Company, Salem Telephone Company, Lewisport Telephone Company all d/b/a TDS Telecom and the urban areas of Kentucky will not be changed because of any action on the part of Leslie County Telephone Company, Salem Telephone Company, Salem Telephone Company, Salem Telephone Company, and Lewisport Telephone Company an

7. The matters addressed above are within my personal knowledge and are true and correct.

Kevin G. Hess Senior Vice President Government & Regulatory Affairs

Sworn and subscribed before me, the undersigned authority, on this the  $\beta$  day of

August, 2007.

Irmgard (N. Metz

Notary Public, State of Wisconsin My Commission expires: May 8, 2011