September 16, 2016

Re: Case No. 2016-00059 – An Inquiry into the State Universal Fund
Responses of Touchtone Communications Inc.

Dear Sir/Madam:

Touchtone Communications Inc. hereby responds to Staff’s First and Second Requests for Information to All Parties of Record.

An electronic version of this filing was uploaded to the Public Service Commission’s Electronic Filing System on this day. Pursuant to 807 KAR 5:001 Section 8(5)(a), I certify the electronic version is a true and accurate copy of the paper medium. I further certify that I am the authorized agent for the entity filing this Response and possess the facilities to receive electronic transmissions.

I have enclosed an extra copy of this cover letter to be date stamped and returned to me in the enclosed self-addressed postage prepaid envelope. If you have any questions or if I may provide you with additional information, please do not hesitate to contact me. Thank you.

Respectfully submitted,

s/ Lance J.M. Steinhart

Lance J.M. Steinhart
Managing Attorney
Lance J.M. Steinhart, P.C.
COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

AN INQUIRY INTO THE STATE ) CASE NO.
UNIVERSAL SERVICE FUND ) 2016-00059

TOUCHTONE COMMUNICATIONS INC.’S RESPONSES TO COMMISSION STAFF’S
FIRST AND SECOND REQUESTS FOR INFORMATION TO ALL PARTIES OF
RECORD

Touchtone Communications Inc. (“Touchtone” or the “Company”) hereby submits its
responses to the Kentucky Public Service Commission (“Commission”) Staff’s First and Second
Requests for Information to All Parties of Record dated April 6, 2016 and June 22, 2016.
CERTIFICATION

I, Daniel Velez, first being duly sworn, depose and state that I am the Regulatory Compliance Coordinator of Touchtone Communications Inc., and do hereby declare under oath that the foregoing responses are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.

Executed on 09/16/2016

Daniel Velez, Regulatory Compliance Coordinator
Touchtone Communications Inc.
CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8, I certify that the September 16, 2016 electronic filing of these Data Responses is a true and accurate copy of the same document being filed in paper medium; that the electronic filing was transmitted to the Commission on July 13, 2016; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that an original paper medium of these Data Responses will be mailed to the Commission by first class United States mail, postage prepaid, September 16, 2016.

s/ Lance J.M. Steinhart

Lance J.M. Steinhart
Responses to Staff's First Request for Information to All Parties

REQUEST NO. 1

Provide the KUSF reimbursement forms submitted to the Commission and the Department of Finance and Administration from January 2014 to present.

Response: Please see attached Exhibit A.

Responsible Witness: Daniel Velez, Regulatory Compliance Coordinator
Responses to Staff’s First Request for Information to All Parties

REQUEST NO. 2

Explain how the total number of subscriber lines is calculated for the KUSF reimbursement form when a new customer receives service in the middle of a month.

Response: The total number of subscriber lines reported on the KUSF reimbursement form is calculated using the number of customers receiving Lifeline support on the last day of each month.

Responsible Witness: Daniel Velez, Regulatory Compliance Coordinator
Responses to Staff's First Request for Information to All Parties

REQUEST NO. 3

Explain how the total number of subscriber lines is calculated for the KUSF reimbursement form when a customer leaves in the middle of a month.

Response: Please see Response to Request No. 2, above.

Responsible Witness: Daniel Velez, Regulatory Compliance Coordinator
Responses to Staff's First Request for Information to All Parties

REQUEST NO. 4

Explain how the KUSF surcharge remittance is calculated when you experience a bad debt. Explain whether none of the surcharge amount or the full surcharge amount billed to, but not paid by, the customer is remitted.

Response: If Touchtone were to experience a bad debt it would remit the full amount of the KUSF surcharge to the customer.

Responsible Witness: Daniel Velez, Regulatory Compliance Coordinator
Responses to Staff’s First Request for Information to All Parties

REQUEST NO. 5

State whether you believe the commission should wait until the FCC’s investigation of Lifeline Reform is concluded before rendering a decision in this proceeding, and explain the basis for your response.

Response: Touchtone believes that the Commission should wait until the FCC’s investigation of Lifeline Reform is concluded before rendering a decision in the proceeding because the FCC may make additional reforms that may affect how the Commission resolves to administer the KUSF. Waiting to ensure the KUSF reforms coincide with the reforms to the federal Lifeline program could avoid the Commission having to modify the KUSF after the Lifeline Reform is concluded.

Responsible Witness: Daniel Velez, Regulatory Compliance Coordinator
Responses to Staff’s First Request for Information to All Parties

REQUEST NO. 6

State how soon upon the issuance of an Order by the Commission changing the KUSF surcharge that you are or anticipate being able to implement the changes on customer bills. If it differs by type of account, provide the information for each type of account, along with the number of access lines for each account type.

Response: Touchtone anticipates it could implement the changes on customer bills within sixty (60) days.

Responsible Witness: Daniel Velez, Regulatory Compliance Coordinator
Responses to Staff’s Second Request for Information to All Parties

REQUEST NO. 1

If not already provided in a previous response to a Commission Staff request for information, respond to the following:

Response: The Company previously provided responses to Request No. 1 (a-d) in its Responses to Staff’s First Request for Information to All Parties. Additional or supplemental responses, if any, are provided below.

a) Provide the monthly Kentucky Universal Service Fund ("KUSF") forms¹ ("KUSF form") submitted to the Commission and the Department of Finance and Administration from January 2014 to the present.

b) Explain how the total number of subscriber lines is calculated for the KUSF form when a new customer receives service in the middle of a month.

Response: Please see Response No. 2 to Staff’s First Request for Information to All Parties.

c) Explain how the total number of subscriber lines is calculated for the KUSF form when a customer leaves in the middle of a month.

Response: Please see Response No. 3 to Staff’s First Request for Information to All Parties.

d) Explain how the KUSF surcharge remittance is calculated when you experience a bad debt. Explain whether none of the surcharge amount or the full surcharge amount billed to, but not paid by, the customer is remitted.

Response: Please see Response No. 4 to Staff’s First Request for Information to All Parties.

e) State whether the KUSF surcharge billed to a customer is prorated if the customer has service for less than a full month.

Response: If a customer has services for less than a month Touchtone would not prorate the KUSF surcharge billed to the customer.

Responsible Witness: Daniel Velez, Regulatory Compliance Coordinator

¹ Commission Staff's First Request for Information referred to these forms as "reimbursement" forms. In this request, Commission Staff is referring to the forms that the parties are to file monthly pursuant to the Commission's decision in An Inquiry into Universal Service Funding Issues, Administrative Case No. 360 (KY. PSC May, 22, 1998) (form last revised March 10, 2016). These forms are to be filed regardless of whether a party is seeking reimbursement from the KUSF.
Responses to Staff’s Second Request for Information to All Parties

REQUEST NO. 2

If no KUSF forms have been submitted to the Commission and the Kentucky Department of Finance and Administration from January 2014, to the present, explain why the KUSF forms have not been submitted.

   a) If no KUSF forms have been submitted, state whether you collect the KUSF surcharge from your customers.

   b) If you do not collect the KUSF surcharge from your customers, explain why the KUSF surcharge has not been collected.

   c) If no KUSF forms have been submitted, state whether you remit the KUSF surcharge to the Kentucky Department of Finance and Administration.

   d) If you do not remit the KUSF surcharge to the Kentucky Department of Finance and Administration, explain why the KUSF surcharge has not been remitted.

Response: Not applicable; the Company has been submitting KUSF forms and remitting the KUSF surcharge to the Kentucky Department of Finance and Administration.

Responsible Witness: Daniel Velez, Regulatory Compliance Coordinator
Responses to Staff’s Second Request for Information to All Parties

REQUEST NO. 3

Explain the anticipated impact, if any, that the FCC’s recent Lifeline Reform Order\(^2\) will have on the provision of Lifeline service in Kentucky, including, but not limited to, verifying eligibility of Lifeline customers; the potential provision of broadband service; and, the impact of the reduction of Federal Universal Service funding for voice service.

Response: Touchtone is not a Lifeline provider and does not intend to provide Lifeline services, therefore are not apprised with the FCC’s recent Lifeline Reform Order.

Responsible Witness: Daniel Velez, Regulatory Compliance Coordinator

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\(^2\) See Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42; Telecommunications Carriers Eligible for Universal Service Support, WC Docket No 09-197; Connect America Fund, WC Docket No. 10-90, Third Report and Order; Further Report and Order, and Order on Reconsideration (Rel. April 27, 2016) ("Lifeline Reform Order").
REQUEST NO. 4

In light of the *Lifeline Reform Order*, explain how a reduction in the amount of, or elimination of, KUSF support would impact the provision of Lifeline service in Kentucky.

Response: Touchtone is not a Lifeline provider and does not intend to provide Lifeline services, therefore are not apprised with the FCC’s recent Lifeline Reform Order.

**Responsible Witness:** Daniel Velez, Regulatory Compliance Coordinator
Exhibit A
Date February 3, 2014

Company Name
Touchtone Communications, Inc.

Company Address
16 South Jefferson Road, Whippany, NJ 07981

Telephone / Fax
(973) 739-0039 (973) 739-9366

Vendor Number

Classification
Please Circle One
ILEC
CLEC
Cellular
PCS

<table>
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<th>Monthly Access Line Data</th>
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<td>3. Amount of Surcharge Remitted to Kentucky USF</td>
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<td>4. Number of Access Lines Receiving Lifeline Support</td>
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<td>5. Amount of Reimbursement Requested from Kentucky USF</td>
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Signature Block

I hereby attest that the information reported herein is true and accurate to the best of my knowledge.

Company Official Susan Cockerham Title Attorney In Fact
(Printed)

Make check payable to: “Kentucky State Treasurer” and send with this report to:

Finance and Administration Cabinet
ATTN: KY USF
702 Capital Ave.
Capitol Annex, Room 488A
Frankfort, KY 40601

Send a copy of this report to:

Kentucky Public Service Commission
ATTN: Jim Stevens
211 Sower Blvd.
P.O. Box 615
Frankfort, KY 40602

Revised 03-13-2008
Date: March 3, 2014  
Reporting Month: February 2014

### Carrier Information

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### Classification

Please Circle One:  
- ILEC  
- CLEC
- Cellular
- PCS

### Monthly Access Line Data

1. Total Access Lines in Service: 0

2. Surcharge Per Access Line: $0.08

3. Amount of Surcharge Remitted to Kentucky USF: $0.00

4. Number of Access Lines Receiving Lifeline Support: 0

5. Amount of Reimbursement Requested from Kentucky USF: $0.00

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Title: Attorney In Fact  
Company Official: Susan Cockerham

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Date: April 2, 2014
Reporting Month: March 2014

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Revised 03-13-2008
# COMMONWEALTH OF KENTUCKY
## UNIVERSAL SERVICE FUND

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### Monthly Access Line Data

1. Total Access Lines in Service: 0

2. Surcharge Per Access Line: $0.08

3. Amount of Surcharge Remitted to Kentucky USF: $0.00

4. Number of Access Lines Receiving Lifeline Support: 0

5. Amount of Reimbursement Requested from Kentucky USF: $0.00

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Revised 03-13-2008
**COMMONWEALTH OF KENTUCKY**  
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**Date** June 2, 2014  
**Reporting Month** May 2014

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Company Official: Susan Cockerham  
Title: Attorney In Fact

(Printed) (Signed)

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Revised 03-13-2008
Date: July 3, 2014  
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Revised 03-13-2008
COMMONWEALTH OF KENTUCKY
UNIVERSAL SERVICE FUND

Date August 5, 2014  Reporting Month July 2014

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Monthly Access Line Data

1. Total Access Lines in Service........................................... 0
2. Surcharge Per Access Line.................................................. $0.08
3. Amount of Surcharge Remitted to Kentucky USF......................... $ 0.00
4. Number of Access Lines Receiving Lifeline Support.................... 0
5. Amount of Reimbursement Requested from Kentucky USF............... $ 0.00

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Company Official Susan Cockerham (Printed) Title Attorney In Fact

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Revised 03-13-2008
**Date** September 3, 2014  
**Reporting Month** August 2014

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Company Official  
**Susan Cockerham**  
Title  
Attorney In Fact  
Company Official  
**Susan Cockerham**

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Revised 03-13-2008
Date: October 2, 2014
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Monthly Access Line Data

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Title: Attorney In Fact
Company Official: Susan Cockerham (Signed)

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Company Official: Susan Cockerham
Title: Attorney In Fact
Company Official: [Signature]

Make check payable to: “Kentucky State Treasurer” and send with this report to:

Finance and Administration Cabinet
ATTN: KY USF
702 Capital Ave.
Capitol Annex, Room 488A
Frankfort, KY 40601

Send a copy of this report to:

Kentucky Public Service Commission
ATTN: Jim Stevens
211 Sower Blvd.
P.O. Box 615
Frankfort, KY 40602

Revised 03-13-2008
## Carrier Information

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</tr>
<tr>
<td>Telephone / Fax</td>
<td>(973) 739-0039 (973) 739-9366</td>
</tr>
</tbody>
</table>

## Classification

| Please Circle One | ILEC ☑ CLEC  Cellular  PCS |

## Monthly Access Line Data

| 1. Total Access Lines in Service | 0 |
| 2. Surcharge Per Access Line     | $0.08 |
| 3. Amount of Surcharge Remitted to Kentucky USF | $0.00 |
| 4. Number of Access Lines Receiving Lifeline Support | 0 |
| 5. Amount of Reimbursement Requested from Kentucky USF | $0.00 |

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Title: Attorney In Fact  
Company Official (Signed): [Signature]

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Revised 03-13-2008
## Monthly Access Line Data

1. Total Access Lines in Service: 0
2. Surcharge Per Access Line: $0.08
3. Amount of Surcharge Remitted to Kentucky USF: $0.00
4. Number of Access Lines Receiving Lifeline Support: 0
5. Amount of Reimbursement Requested from Kentucky USF: $0.00

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Revised 03-13-2008
Date: February 3, 2015

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Classification

Please Circle One

ILEC   CLEC  Cellular  PCS

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Revised 03-13-2008
**Commonwealth of Kentucky**

**Universal Service Fund**

*Date: March 2, 2015*

*Reporting Month: February 2015*

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### Classification

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  - CLEC
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P.O. Box 615
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Revised 03-13-2008
Date: April 3, 2015  Reporting Month: March 2015

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Revised 03-13-2008
COMMONWEALTH OF KENTUCKY
UNIVERSAL SERVICE FUND

Date May 4, 2015
Reporting Month April 2015

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### Classification

- **Please Circle One**
  - ILEC  ✓  CLEC
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### Monthly Access Line Data

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Company Official: **Susan Cockerham**  
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Title: **Attorney In Fact**  
(Signed)

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Frankfort, KY 40602

Revised 03-13-2008
Date August 3, 2015 Reporting Month July 2015

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Company Official Susan Cockerham (Signed)

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Revised 03-13-2008
Date September 2, 2015 Reporting Month August 2015

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Classification

Please Circle One

ILEC [X] CLEC  Cellular  PCS

Monthly Access Line Data

1. Total Access Lines in Service ................................................ _____ 0 _____
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   $0.08
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Revised 03-13-2008
Date: October 2, 2015
Reporting Month: September 2015

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Classification
Please Circle One
ILEC  ✓ CLEC  Cellular  PCS

Monthly Access Line Data

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Revised 03-13-2008
Date: January 5, 2016

Company Name: Touchtone Communications, Inc.
Company Address: 16 South Jefferson Road, Whippany, NJ 07981
Telephone / Fax: (973) 739-0039 (973) 739-9366

Classification
Please Circle One: ILEC CLEC Cellular PCS

Monthly Access Line Data

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Title: Attorney In Fact

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Revised 03-13-2008
### Commonwealth of Kentucky
#### Universal Service Fund

**Date** February 4, 2016  
**Reporting Month** January 2016

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<td>16 South Jefferson Road, Whippany, NJ 07981</td>
</tr>
<tr>
<td>Telephone / Fax</td>
<td>(973) 739-0039 (973) 739-9366</td>
</tr>
<tr>
<td>Vendor Number</td>
<td></td>
</tr>
</tbody>
</table>

### Classification

<table>
<thead>
<tr>
<th>Please Circle One</th>
<th>ILEC</th>
<th>CLEC</th>
<th>Cellular</th>
<th>PCS</th>
</tr>
</thead>
</table>

### Monthly Access Line Data

1. **Total Access Lines in Service** ........................................... 0
2. **Surcharge Per Access Line** ........................................... $0.08
3. **Amount of Surcharge Remitted to Kentucky USF** ............... $0.00
4. **Number of Access Lines Receiving Lifeline Support** ........ 0
5. **Amount of Reimbursement Requested from Kentucky USF** ...... $0.00

### Signature Block

I hereby attest that the information reported herein is true and accurate to the best of my knowledge.

**Company Official** Jennifer Rabig  
**Title** Attorney In Fact  
**Company Official** (Signed)

---

Make check payable to: “Kentucky State Treasurer” and send with this report to:

Finance and Administration Cabinet  
ATTN: KY USF  
702 Capital Ave.  
Capitol Annex, Room 488A  
Frankfort, KY 40601

Send a copy of this report to:

Kentucky Public Service Commission  
ATTN: Jim Stevens  
211 Sower Blvd.  
P.O. Box 615  
Frankfort, KY 40602

Revised 03-13-2008
**COMMONWEALTH OF KENTUCKY**

**UNIVERSAL SERVICE FUND**

Date March 4, 2016  Reporting Month February 2016

### Carrier Information

<table>
<thead>
<tr>
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### Classification

Please Circle One

| ILEC | CLEC | Cellular | PCS |

### Monthly Access Line Data

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Company Official: Jennifer Rabig  Title: Attorney In Fact  Company Official: (Signed)

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Send a copy of this report to:

Kentucky Public Service Commission  ATTN: Executive Director  211 Sower Blvd.  P.O. Box 615  Frankfort, KY 40602

Revised 02-15-2016
# Universal Service Fund Report

**Commonwealth of Kentucky**
**Universal Service Fund**

**Date:** April 5, 2016  
**Reporting Month:** March 2016

## Carrier Information

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## Classification

- **Please Circle One:** ILEC  
- **CLEC**  
- Cellular  
- PCS

## Monthly Access Line Data

1. **Total Access Lines in Service:** 0
2. **Surcharge Per Access Line:** $0.14
3. **Amount of Surcharge Remitted to Kentucky USF:** $0.00
4. **Number of Access Lines Receiving Lifeline Support:** 0
5. **Amount of Reimbursement Requested from Kentucky USF:** $0.00

## Signature Block

I hereby attest that the information reported herein is true and accurate to the best of my knowledge.

<table>
<thead>
<tr>
<th>Company Official</th>
<th>Jennifer Rabig</th>
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Revised 03-10-2016
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Company Official: (Printed)  
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Revised 03-10-2016
**COMMONWEALTH OF KENTUCKY**
**UNIVERSAL SERVICE FUND**

Date __ June 7, 2016 __ Reporting Month __ May 2016 __

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Revised 03-10-2016
**COMMONWEALTH OF KENTUCKY**
**UNIVERSAL SERVICE FUND**

Date: July 8, 2016  
Reporting Month: June 2016

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Revised 03-10-2016
# Universal Service Fund Reporting Form

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Revised 03-10-2016