

**Before the  
OFFICE OF MANAGEMENT AND BUDGET**

In the Matter of	)	
	)	
Notice of Information Collection	)	OMB Control No. 3060-0819
Pursuant to the Paperwork Reduction Act	)	80 Fed. Reg. 67738
Lifeline and Link Up Reform	)	
and Modernization	)	

**PAPERWORK REDUCTION ACT COMMENTS  
OF  
NTCA–THE RURAL BROADBAND ASSOCIATION,  
WTA – ADVOCATES FOR RURAL BROADBAND, AND  
JSI**

**December 3, 2015**

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**Attachment 1: Declarations of Small Eligible Telecommunications Carriers**

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JSI**

**I. INTRODUCTION & SUMMARY**

NTCA–The Rural Broadband Association (“NTCA”),<sup>1</sup> WTA – Advocates for Rural Broadband,<sup>2</sup> and John Staurulakis, Inc. (“JSI”)<sup>3</sup> (collectively “Rural Representatives”) hereby submit these comments in response to a Notice of Information Collection<sup>4</sup> regarding the Paperwork Reduction Act (“PRA”)<sup>5</sup> burdens arising out of information collections adopted in the Federal Communications Commission’s (“FCC”) Lifeline Reform and Modernization

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<sup>1</sup> NTCA represents nearly 900 rural rate-of-return regulated telecommunications providers (“RLECs”). All of NTCA’s members are full service local exchange carriers and broadband providers, and many of its members provide wireless, cable, satellite, and long distance and other competitive services to their communities.

<sup>2</sup> WTA – Advocates for Rural Broadband is a national trade association representing more than 280 rural telecommunications providers offering voice, broadband and video services in rural America. WTA members serve some of the most rural and hard-to-serve communities in the country and are providers of last resort to those communities.

<sup>3</sup> JSI is a telecommunications consulting firm offering a full spectrum of regulatory, financial and operational services to over 275 primarily rural independent telecommunications providers in 45 states and the U.S. territory of Guam.

<sup>4</sup> Information Collection Being Reviewed by the Federal Communications Commission, Comments Requested, 80 Fed. Reg. 67738 (published Nov. 3, 2015) (“Notice”).

<sup>5</sup> Paperwork Reduction Act of 1995, Public Law No. 104-13, 109 Stat. 163 (May 22, 1995), *codified at* 44 U.S.C. §3501, *et seq.*

proceeding.<sup>6</sup> As demonstrated below, the revised data collections will impose an unreasonable burden upon the small businesses represented by the Rural Representatives. The FCC had several options to minimize this burden on small businesses in ways that would have maintained its ability to accomplish the goals of the data collection, but it chose not to avail itself of such options. Furthermore, the information collections at issue herein are likely to be rendered moot by additional reforms to the Lifeline program. The Office of Management and Budget (“OMB”) should therefore decline to approve the data collection as submitted by the FCC and remand the data collection to the FCC as discussed in greater detail in Section III, *infra*.

## **II. THE FCC IMPROPERLY FAILED TO ADHERE TO THE REQUIREMENTS OF THE PAPERWORK REDUCTION ACT, AND THE OMB SHOULD THEREFORE DECLINE TO APPROVE THE INFORMATION COLLECTION**

Pursuant to the PRA, all federal agencies are required to estimate the burden of proposed information collections and justify the need for the data collection. Most importantly, the FCC is also required to investigate and implement less burdensome alternatives for small entities affected by actions that trigger the PRA. As the PRA states, the FCC is required to certify that the new or revised information collection:

(C) reduces to the extent practicable and appropriate the burden on persons who shall provide information to or for the agency, *including with respect to small entities*...[through] the use of such techniques as –

(i) establishing different...reporting requirements...that take into account the resources available to those who are to respond;

(ii) the clarification, consolidation, or simplification of compliance and reporting requirements; or

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<sup>6</sup> 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, Second Further Notice of Proposed Rulemaking, Order on Reconsideration, Second Report and Order, and Memorandum Opinion and Order, FCC 15-71 (rel. Jun. 22, 2015) (“*Second Report and Order*” or “*Order on Reconsideration*”).

(iii) *an exemption from coverage* of the collection of information, or any part thereof.<sup>7</sup>

As the Rural Representatives noted in filings to the FCC,<sup>8</sup> both the “Snapshot Rule” as established by the *Second Report and Order* and the document retention and security rules as adopted by the *Order on Reconsideration* impose substantial burdens on the Rural Representatives’ small carrier members and clients. On average, these small entities have fewer than 25 employees, many of whom are required to “wear multiple hats” in terms of both compliance with FCC rules and other functions for operations that span hundreds or even thousands of square miles, including customer service representatives to plant engineers and technicians installing and maintaining network facilities throughout what are typically large but sparsely populated rural areas. This also includes office personnel with the responsibility of maintaining compliance with the numerous other reporting requirements applicable to RLECs and their affiliated entities. Many small carriers also outsource these duties to consultants as a result of limited internal resources.

Not only did the FCC fail to fully assess the increased burdens these new requirements will have on small providers, it also failed to properly consider alternative measures that could

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<sup>7</sup> 44 U.S.C. § 3506 (c)(3) (emphasis added). *See also*, Memorandum for the Heads of Executive Departments and Agencies, Executive Office of the President (rel. June 22, 2012). In June of 2012, the Executive Office of the President released a memorandum discussing Executive Order 13610, which required federal agencies to eliminate unjustified regulatory requirements, including unnecessary reporting and paperwork burdens. In that memorandum, the Administrator of the Office of Information and Regulatory Affairs outlined several steps that federal agencies could take to reduce the paperwork and reporting burdens on small businesses. Among these were exemptions or streamlining for small entities (including small businesses). As the memo states, “[b]ecause of economies of scale, a collection may be disproportionately more burdensome for a small entity than a large one. Important burden reduction efforts may involve exemptions of small entities from reporting requirements, or streamlined requirements for such entities.”

<sup>8</sup> Comments of JSI, NTCA, & WTA, WC Docket No. 11-42, *et al.*, (fil. Sep. 28, 2015) (“September 28 comments”); Reply to Opposition of JSI, NTCA, & WTA, WC Docket No. 11-42, *et al.*, (fil. Oct. 19, 2015) (“October 19 reply”).

have lessened the burden on the Rural Representatives' members and clients. Accordingly, OMB should decline to approve the FCC's revised information collection request as submitted.

### **III. THE FCC SEVERELY UNDERESTIMATED THE SUBSTANTIAL BURDENS THE FORM 497 AND DOCUMENT RETENTION REQUIREMENTS WILL IMPOSE ON SMALL PROVIDERS**

Despite reference in the *Second Report and Order* to the need for carriers to “make whatever changes are necessary to their billing systems to take a snapshot on the first day of the month,”<sup>9</sup> the FCC estimates that the new Snapshot Rule “will not change the burden hours associated with this requirement.”<sup>10</sup> Contrary to the claims that the new Snapshot rule will not change the burden hours associated with filing monthly Forms 497 for reimbursement, however, the Snapshot Rule will indeed require RLECs to significantly alter their billing systems or alter their reporting procedures to manually complete Form 497 to ensure its accuracy. While the FCC estimates that completion of the Form 497 takes 1.5 hours per month per provider, the attached Declarations demonstrate that the time necessary to complete Forms 497 on a monthly basis will increase to 2.5 hours per month for many small providers. As previously explained to the FCC in the September 28 comments,

Many RLECs rely on their system-generated billing reports to populate the subscriber numbers on FCC Form 497 and other monthly regulatory filings. By using billing reports, ETCs have reliable, static data that they can go back and replicate for any past bill cycle, and ensure that the numbers will be consistent. Transitioning to the Snapshot Rule will cause RLECs to either manually compile data for FCC form 497 or pull their subscribers numbers from less reliable reports that will not be as accurate as those produced from the monthly billing process, nor will they be consistent with other regulatory reports filed with federal and state agencies.<sup>11</sup>

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<sup>9</sup> *Second Report and Order* at ¶243.

<sup>10</sup> Federal Communications Commission, Supporting Statement to ICR Reference Number 201510-3060-007, OMB Control Number 3060-0819 (filed Nov. 4, 2015) (“Supporting Statement”), p. 6.

<sup>11</sup> September 28 comments, p. 9.

The impact of dedicating additional resources through additional time and costs incurred to comply are particularly pronounced for small providers often with substantially fewer than 5% of their total customers receiving Lifeline benefits. Indeed, in addition to the monthly recurring costs associated with the change to the Snapshot Rule, RLECs will also incur non-recurring expenses associated with developing and testing new reports to identify the customers who are added or removed after monthly billing is run (generally several days before the 1<sup>st</sup> of the month) or costs passed on through third-party billing vendors.

Atop these new burdens arising out of the revised Form 497 requirement, smaller carriers now face the prospect of increased costs from document retention and security requirements. Despite assurance that electronic storage capabilities will mitigate these costs,<sup>12</sup> the new rules will require carriers to retain and secure documents they were once required to destroy, as well as implement specific security measures prescribed by the FCC in the *Order on Reconsideration*. Such fundamental changes to the process will impose significant costs for small providers, such as the need to develop, implement, and train employees on new document retention policies and procedures to comply with the new requirements. The FCC, however, underestimates both the time required and expense to small providers seeking to comply with the new document retention rule.

While the FCC estimates that the new document retention and security requirements will require approximately one hour per year and an annual cost of \$40 to comply, small providers expect to spend far more than \$40 per month in order to ensure compliance with these specific aspects of the Order. The FCC's time and cost estimates fail to include the fixed and recurring cost of acquisition, installation, and configuration of hardware to maintain electronic records and

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<sup>12</sup> *Second Report and Order*, Appendix D, Final Regulatory Flexibility Analysis ("FRFA") ¶ 3.

maintenance of such systems, including the need to update electronic security measures, as well as the time and resources necessary to train employees on new procedures and IT systems. Some carriers estimate that it would cost at least \$10,000 to upgrade existing systems to comply with the new document and security rule.

Such underestimates by the FCC, both as to the Form 497 requirement and the obligation to retain and secure documents, demonstrate a lack of concern or understanding of the practical effect of such rules on carriers' day-to-day operations, particularly the effect that the rules will have on carriers with fewer than 25 employees whose time is often spent on a wide variety of tasks.

#### **IV. THE FCC FAILED TO CONSIDER LESS BURDENSOME ALTERNATIVE FORM 497 REPORTING AND DOCUMENT RETENTION REQUIREMENTS FOR SMALLER PROVIDERS**

In addition to the FCC's underestimation of the compliance burdens associated with its new rules, the newly adopted Snapshot Rule will require companies that bill their Lifeline customers on a monthly basis to either undergo costly billing system changes or implement a manual process which would increase the time required of their small administrative staffs to prepare Form 497. Likewise, the document retention and security measures adopted by the *Order on Reconsideration* also impose similarly burdensome requirements on the very same small RLEC staffs.

Although the FCC states that it previously considered arguments and rejected arguments raised by the Rural Representatives in response to a Petition for Reconsideration of the Snapshot Rule in the underlying rulemaking proceeding,<sup>13</sup> a review of the *Second Report and Order* reveals no such consideration of the impact and compliance burdens the new Snapshot Rule will

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<sup>13</sup> Supporting Statement, p. 10.



have on small providers.<sup>14</sup> In fact, the FCC references “industry support” of the Snapshot Rule without citation to applicable comments in the record to support the Order’s assertion that “compliance . . . will be high and the administrative costs associated will be low.”<sup>15</sup> No small providers in the record commented on the development of a uniform snapshot date rule. Furthermore, the FCC’s Final Regulatory Flexibility Analysis (“RFA”) omits entirely any analysis or discussion of the Snapshot Rule and the billing system changes that companies (including small providers) must make to comply with the new rule<sup>16</sup> despite an acknowledgement by the FCC that “a transition period is appropriate to ensure that ETCs have sufficient time to make whatever changes are necessary to their billing systems to take a snapshot on the first day of the month.”<sup>17</sup> Similarly, neither does the RFA discuss the implications that the FCC’s decision to require providers to retain eligibility documentation will have on small providers with respect to the need to secure sensitive Lifeline eligibility documentation. Although the Rural Representatives’ members and clients are continually pursuing enhancements to their security practices, the need to retain documentation previously required by the FCC to be destroyed will require additional technical support and staff training to ensure compliance with the new requirements. In fact, the FCC summarily dismissed concerns raised by Gila River regarding the administrative impact that this change would have on small ETCs.<sup>18</sup>

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<sup>14</sup> *Second Report and Order* at ¶ 241-42.

<sup>15</sup> *Id.* at ¶ 242.

<sup>16</sup> Neither the Initial nor the Final Regulatory Flexibility Analysis discuss the uniform snapshot date requirement.

<sup>17</sup> *Second Report and Order* at ¶ 243.

<sup>18</sup> Comments of The Gila River Indian Community and Gila River Telecommunications, Inc., WC Docket No. 11-42 et al., p 4 (fil. Jul. 24, 2012).

To make matters worse for small carriers, both the newly adopted Snapshot Rule and the document retention and security rules are quite possibly *temporary* – and the FCC recognizes as much in the *Second Report and Order* and *Order on Reconsideration* and its statement in support of the information collection. The Second Further Notice of Proposed Rulemaking accompanying the *Second Report and Order* and *Order on Reconsideration* asks several questions as to how to reform—for the long term—both the carrier reimbursement process and the consumer eligibility process. Specifically, the FCC points to easing the transition to calculating carrier reimbursement for Lifeline discounts provided to consumers using the National Lifeline Accountability Database (“NLAD”) as proposed in the Second Further Notice as one justification for imposing the Snapshot Rule.<sup>19</sup> At the same time, the FCC is also considering removing entirely Lifeline providers from the consumer eligibility verification process.

Simply the fact that the Snapshot Rule and document retention and security rules may be temporary does not diminish the very real burdens and costs they impose on small carriers. But it does exacerbate the burden of investing in new billing and data retention systems to fulfill obligations that might nonetheless go away in the near future. Lifeline providers must undertake the changes necessary to comply with these rules in the short term regardless of whether the FCC retains them in the long term. Should the FCC move forward with alternate long-term changes, the staff time and other resources put into compliance with these rules is likely wasted. At the very least, the FCC could have held off on adopting the rules at issue herein (or it could have provided an exemption for smaller operators) until long-term reform was completed. Indeed, it appears that such an alternative, which would have minimized the burden on small carriers, was

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<sup>19</sup> *Second Report and Order* at ¶ 242.

never even considered. Rather, the FCC's incremental approach seeking to ease the transition to a modernized Lifeline program places the heaviest burden of incremental progress at the doorsteps of small providers that will need to undergo successive revisions to their business practices in order to comply with the rules as they change.

OMB should not permit the FCC to summarily dismiss (or neglect) the concerns of small providers and their representatives without fully addressing the concerns on the record.<sup>20</sup> Indeed, the FCC should—and is statutorily required—to consider less burdensome alternatives for smaller entities. Establishing long-term reforms to both the carrier reimbursement and consumer eligibility verification processes is a good place to start. Each of the reforms proposed in the Second Further Notice of Proposed Rulemaking, although far from panacea to waste, fraud and abuse in the Lifeline program, has the potential to eliminate a great deal of the burden of complying with the reporting requirements of FCC Form 497 and new documentation retention requirements. In fact, some of the proposals such as implementation of a national Lifeline eligibility verifier would eliminate entirely the need for providers to retain and secure eligibility documentation altogether because carriers would no longer obtain and verify eligibility documentation containing sensitive personal information of Lifeline subscribers.

Moreover, the FCC also has before it additional options for less burdensome alternatives that it has not yet fully considered. With respect to the Snapshot Rule, as the Rural Representatives have suggested, the FCC could enable small providers to use their carrier-

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<sup>20</sup> The Rural Representatives note for OMB that the Paperwork Reduction Act comment period at the FCC ended on Friday, October 30, 2015 and the FCC submitted its request for approval on Tuesday, November 3, giving it only one business day to consider the alternatives proposed by the Rural Representatives. The Rural Representatives are therefore skeptical that the FCC gave their concerns regarding the increased cost and burdens on providers associated with the new Lifeline rules at issue here due consideration prior to submission for OMB approval.

specific billing dates for purposes of completing Form 497.<sup>21</sup> Such an approach would significantly minimize the burdens on small providers of the Snapshot Rule as discussed above. Similarly, a group of Wireless ETCs filed a Petition for Reconsideration seeking to address the potential for the program to not reimburse Lifeline providers for customers that received service but de-enrolled before the uniform Snapshot date the following month, proposed that the FCC allow ETCs to report any qualifying consumers de-enrolled in the previous month.

With respect to the document retention and security rules, should the FCC choose not take carriers out of the eligibility verification process, it could adopt less burdensome requirements such as a shortened document retention period and also avoid mandating specific security methods that must be used in order to take into account the differing security postures among large and small carriers in the industry.<sup>22</sup>

Based on the foregoing, the Rural Representatives urge OMB to decline to approve the information collection as submitted. As discussed above, the FCC failed to even consider less burdensome alternatives as required by the PRA and in fact does not even recognize the burdensome nature of the rules at issue herein in the first place. The FCC should “go back to the drawing board” and take the steps necessary to accurately estimate the burden on the small businesses that make up the Rural Representatives members and clients and then consider,

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<sup>21</sup> September 28 comments.

<sup>22</sup> It is also important to note that the FCC has indicated its intent to move forward with a rulemaking to establish new data security rules pursuant to Section 222 and the Open Internet Order, which reclassified broadband Internet access service as a “telecommunications service” under the Communications Act. Presumably small providers could—and likely would in many instances—need to update or implement new data security practices in order to ensure compliance new data security rules established in that proceeding. Accordingly, the impending Section 222 proceeding is the proper venue for the FCC to impose data security rules if it determines such new rules are necessary in the public interest, and the FCC should refrain from implementing its new Lifeline data security rules until such time as the Section 222 proceeding is complete.

seriously, alternatives that will limit the burden on these companies. In the alternative, should OMB decline to outright reject approval of the revised collection, it could instead remand the proposed revised information collection to the FCC and ask that the rules be held in abeyance until such time as long-term Lifeline reform is accomplished.<sup>23</sup> Finally, at the very least, OMB could direct the FCC to utilize the Rural Representatives' alternative proposal to the Snapshot Rule that would enable carriers to use their carrier-specific billing dates for purposes of Form 497. The FCC could also consider and adopt exemptions to the document retention and security rules for smaller carriers, such as a shortened document retention period and flexibility in security methods that must be used.

## **V. CONCLUSION**

Because the FCC has failed to accurately assess the burdens these new requirements will have on small providers and to properly consider alternative measures that could have lessened the burden on the Rural Representatives' members and clients, OMB should decline to approve the revised information collection request, if at all, until the FCC has completed its ongoing rulemaking to reform and modernize the Lifeline program.

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<sup>23</sup> According to Gigi Sohn, Counselor to FCC Chairman Tom Wheeler, reforming and modernizing the Lifeline program is one of Chairman Wheeler's top priorities. *See*, Kaylee Hultgren, *FCC Chairman Wheeler's Top 7 Priorities*, Cablefax, Nov. 12, 2015 (discussing comments by Gigi Sohn, at a Practising Law Institute forum in November) *available at* <http://www.cablefax.com/regulation/fcc-chairman-wheelers-top-7-priorities>. Because Chairman Wheeler's tenure is not expected to extend much beyond 2016, reform efforts are likely to occur in the very near future. Remanding the rules to the FCC until long term reform efforts are complete therefore will not significantly hamper the FCC in its goals of greater document security and a simpler reimbursement process.

Respectfully submitted,

**NTCA–The Rural Broadband Association**

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WTA – ADVOCATES FOR RURAL BROADBAND, AND  
JSI**

**DECLARATION OF JEAN McCORMACK, PRESIDENT OF PEMBROKE  
TELEPHONE COMPANY, INC.**

1. My name is Jean McCormick, President of Pembroke Telephone Company, Inc. (“Pembroke”) a rural Local Exchange Carrier headquartered in Pembroke, GA. Pembroke provides facilities-based telecommunications and broadband services to Pembroke and other communities in Georgia. I submit this Declaration in support of the Paperwork Reduction Act (“PRA”) comments of NTCA–The Rural Broadband Association, WTA -- Advocates for Rural Broadband, and JSI submitted in the above-captioned proceeding.
2. Pembroke Telephone Company has served North Bryan County and a portion of Bulloch County, located in rural southeastern, Georgia for more than a century. Founded in 1906 and locally owned by the same family since 1946, PTC knows the area, its people and its businesses; and its subsidiary provides long distance, broadband, and video services. PTC is built around its subscribers and community. Pembroke serves approximately 2,883 customers, 66 of whom receive Lifeline. Pembroke has fewer than 25 employees.
3. This declaration is being submitted to share with the Office of Management and Budget (“OMB”) a more accurate reflection of the costs associated with implementing the Lifeline changes proposed by the Federal Communications Commission (“Commission”). Specifically, the changes associated with modifying the Lifeline snapshot date to use data from the first day of the month and the document retention changes far exceed those submitted by the Commission to OMB.
4. Currently, Pembroke uses the billing data automatically generated from its billing system to not only run its monthly billing, but to also populate the FCC Form 497 for the same period. Under the new snapshot rule, the company will have to use a different subset of data and generate additional reports as billing is generally run several days before the end of the month (e.g., billing for December 1 is usually run on November

24 or 25).

5. Although it is too early to realize the full cost of implementing the change to how the FCC Form 497 is populated, based on how long it currently takes to prepare FCC Form 497, Pembroke estimates that it will now take 1.5 to 2.5 hours and cost \$69 to \$115 per month in recurring expenses and an additional 1.5 hours in non-recurring costs for development and testing of new queries to determine subscribers added or taken away after billing.
6. Although Pembroke currently has procedures in place to safeguard proprietary information for all of its customers and Lifeline applications, we estimate that the cost to retain proof of eligibility and identity (e.g., benefit cards, driver's licenses, passports, etc.) will cost more than the \$40 per year estimated by the FCC. Indeed, our company estimates that it will cost \$69 to \$92 in monthly recurring costs.
7. Pembroke believes that the Commission should consider using dollar amounts rather than subscriber counts to populate FCC Form 497. This would allow for partial charges and credits resulting from customer gain and loss and could be reported based on more accurate accounting information created at billing.
8. Should the FCC determine in its current rulemaking that it will move in a different direction in regards to populating the FCC Form 497 (e.g., relying on NLAD) or that it will relieve eligible telecommunications carriers of its requirement to manage Lifeline enrollment, making the document retention rules moot, then Pembroke Telephone Company, Inc. would have undergone these changes for naught.
9. The OMB should decline to approve the information collection as submitted.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my information and belief.

Executed By Jean McCormick, President on 11/12/2015 3:19:02 PM.



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JSI**

**DECLARATION OF PHILIP CAPPALONGA, CFO, OF THE TOLEDO  
TELEPHONE CO., INC.**

1. My name is Philip Cappalonga, CFO of The Toledo Telephone Co., Inc. (“Toledo”) a rural Local Exchange Carrier headquartered in Toledo, WA. Toledo provides facilities-based telecommunications and broadband services to Toledo and other communities in WA. I submit this Declaration in support of the Paperwork Reduction Act (“PRA”) comments of NTCA–The Rural Broadband Association, WTA -- Advocates for Rural Broadband, and JSI submitted in the above-captioned proceeding.
2. In general, Toledo serves a rural area with rolling hills/small mountains with fir forests. We serve a very small town of about 600 households. Agricultural and logging are the main industries. Toledo serves approximately 1,700 customers, 76 of whom receive Lifeline. Toledo has fewer than 25 employees.
3. This declaration is being submitted to share with the Office of Management and Budget (“OMB”) a more accurate reflection of the costs associated with implementing the Lifeline changes proposed by the Federal Communications Commission (“Commission”). Specifically, the changes associated with modifying the Lifeline snapshot date to use data from the first day of the month and the document retention changes far exceed those submitted by the Commission to OMB.
4. Currently, Toledo uses the billing data automatically generated from its billing system to not only run its monthly billing, but to also populate the FCC Form 497 for the same period. Under the new snapshot rule, the company will have to use a different subset of data and generate additional reports as billing is generally run several days before the end of the month (e.g., billing for December 1 is usually run on November 24 or 25).
5. Although it is too early to realize the full cost of implementing the change to how the FCC Form 497 is populated, based on how long it currently takes to prepare FCC Form

497, Toledo estimates that it will now take 1.5 to 2.5 hours and cost \$90 per month in recurring expenses and additional labor to create the reporting in the software.

6. Although Toledo currently has procedures in place to safeguard proprietary information for all of its customers and Lifeline applications, we estimate that the cost to retain proof of eligibility and identity (e.g., benefit cards, driver's licenses, passports, etc.) will cost far more than the \$40 per year estimated by the FCC. Indeed, our company estimates that it will cost \$10 in monthly recurring cost.
7. Small companies with less than 100 Lifeline customers should be exempt from anything other than simply reporting how many Lifeline customers they serve.
8. Should the FCC determine in its current rulemaking that it will move in a different direction in regards to populating the FCC Form 497 (e.g., relying on NLAD) or that it will relieve eligible telecommunications carriers of its requirement to manage Lifeline enrollment, making the document retention rules moot, then The Toledo Telephone Co., Inc. would have undergone these changes for naught.
9. The OMB should decline to approve the information collection as submitted.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my information and belief.

Executed By Philip Cappalonga, CFO on 11/13/2015 11:38:38 AM.

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JSI**

**DECLARATION OF BECKY DARSEY, DIRECTOR OF REGULATORY OF  
NORTHEAST LOUISIANA TELEPHONE CO., INC.**

1. My name is Becky Darsey, Director of Regulatory of Northeast Louisiana Telephone Co., Inc. (“NE Louisiana”) a rural Local Exchange Carrier headquartered in Collinston, LA. NE Louisiana provides facilities-based telecommunications and broadband services to Collinston and other communities in LA. I submit this Declaration in support of the Paperwork Reduction Act (“PRA”) comments of NTCA–The Rural Broadband Association, WTA -- Advocates for Rural Broadband, and JSI submitted in the above-captioned proceeding.
2. In general, our service territory is an extremely rural service area composed of a high percentage of low income and retired individuals. NE Louisiana serves approximately 518 customers, 23 of whom receive Lifeline. NE Louisiana has fewer than 25 employees.
3. This declaration is being submitted to share with the Office of Management and Budget (“OMB”) a more accurate reflection of the costs associated with implementing the Lifeline changes proposed by the Federal Communications Commission (“Commission”). Specifically, the changes associated with modifying the Lifeline snapshot date to use data from the first day of the month and the document retention changes far exceed those submitted by the Commission to OMB.
4. Currently, NE Louisiana uses the billing data automatically generated from its billing system to not only run its monthly billing, but to also populate the FCC Form 497 for the same period. Under the new snapshot rule, the company will have to use a different subset of data and generate additional reports as billing is generally run several days before the end of the month (e.g., billing for December 1 is usually run on November 24 or 25).

5. Although it is too early to realize the full cost of implementing the change to how the FCC Form 497 is populated, based on how long it currently takes to prepare FCC Form 497, NE Louisiana estimates that it will now cost \$50 per month in recurring expenses in addition to costs that will be passed on by our outside vendor who certifies our Lifeline customers and passes the information to our company.
6. Although NE Louisiana currently has procedures in place to safeguard proprietary information for all of its customers and Lifeline applications, we estimate that the cost to retain proof of eligibility and identity (e.g., benefit cards, driver's licenses, passports, etc.) will cost far more than the \$40 per year estimated by the FCC. Indeed, our company estimates that it will cost \$50 in monthly recurring costs.
7. Should the FCC determine in its current rulemaking that it will move in a different direction in regards to populating the FCC Form 497 (e.g., relying on NLAD) or that it will relieve eligible telecommunications carriers of its requirement to manage Lifeline enrollment, making the document retention rules moot, then Northeast Louisiana Telephone Co., Inc. would have undergone these changes for naught.
8. The OMB should decline to approve the information collection as submitted.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my information and belief.

Executed By Becky Darsey, Director of Regulatory on 11/13/2015 11:39:02 AM.

**Before the  
OFFICE OF MANAGEMENT AND BUDGET  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Notice of Information Collection	)	OMB Control No. 3060-0819
Pursuant to the Paperwork Reduction Act	)	
Lifeline and Link Up Reform	)	
and Modernization	)	

**PAPERWORK REDUCTION ACT COMMENTS  
OF  
NTCA–THE RURAL BROADBAND ASSOCIATION,  
WTA – ADVOCATES FOR RURAL BROADBAND, AND  
JSI**

**DECLARATION OF DARBY A. McCARTHY OF SMITHVILLE  
COMMUNICATIONS, INC.**

1. My name is Darby A. McCarty of Smithville Communications Inc. (“Smithville”) a rural Local Exchange Carrier headquartered in Ellettsville, IN. Smithville provides facilities-based telecommunications and broadband services to Ellettsville and other communities in IN. I submit this Declaration in support of the Paperwork Reduction Act (“PRA”) comments of NTCA–The Rural Broadband Association, WTA -- Advocates for Rural Broadband, and JSI submitted in the above-captioned proceeding.
2. We have several exchanges in rural central & southern Indiana. Smithville serves approximately 21,204 customers, 110 of whom receive Lifeline.
3. This declaration is being submitted to share with the Office of Management and Budget (“OMB”) a more accurate reflection of the costs associated with implementing the Lifeline changes proposed by the Federal Communications Commission (“Commission”). Specifically, the changes associated with modifying the Lifeline snapshot date to use data from the first day of the month and the document retention changes far exceed those submitted by the Commission to OMB.
4. Currently, Smithville uses the billing data automatically generated from its billing system to not only run its monthly billing, but to also populate the FCC Form 497 for the same period. Under the new snapshot rule, the company will have to use a different subset of data and generate additional reports as billing is generally run several days before the end of the month (e.g., billing for December 1 is usually run on November 24 or 25).
5. Although it is too early to realize the full cost of implementing the change to how the FCC Form 497 is populated, based on how long it currently takes to prepare FCC Form 497, Smithville estimates that it will now take up to 2.5 hours and cost \$80 per month

to comply with the new Snapshot Rule.

6. Although Smithville currently has procedures in place to safeguard proprietary information for all of its customers and Lifeline applications, we estimate that the cost to retain proof of eligibility and identity (e.g., benefit cards, driver's licenses, passports, etc.) will cost far more than the \$40 per year estimated by the FCC. Indeed, our company estimates that it will cost \$150 in monthly recurring costs and an additional unknown amount of upfront costs to comply with the new data retention rule.
7. Solix (our third party administrator) receives and reviews each application submitted for completeness (ensuring that all required information and acknowledgments are present) and analyzes supporting documentation to verify that eligibility criteria are met. The result of each eligibility determination is recorded in Solix's system and on the application form. Smithville Communications will need to work out procedures to obtain and store the information in our system.
8. Should the FCC determine in its current rulemaking that it will move in a different direction in regards to populating the FCC Form 497 (e.g., relying on NLAD) or that it will relieve eligible telecommunications carriers of its requirement to manage Lifeline enrollment, making the document retention rules moot, then Smithville Communications Inc. would have undergone these changes for naught.
9. The OMB should decline to approve the information collection as submitted.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my information and belief.

Executed By Darby A. McCarty on 11/13/2015 12:03:31 PM.

**Before the  
OFFICE OF MANAGEMENT AND BUDGET  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Notice of Information Collection	)	OMB Control No. 3060-0819
Pursuant to the Paperwork Reduction Act	)	
Lifeline and Link Up Reform	)	
and Modernization	)	

**PAPERWORK REDUCTION ACT COMMENTS  
OF  
NTCA–THE RURAL BROADBAND ASSOCIATION,  
WTA – ADVOCATES FOR RURAL BROADBAND, AND  
JSI**

**DECLARATION OF ANDREA MATHIE, REGULATORY SUPERVISOR OF  
BRANTLEY TELEPHONE, CO., INC.**

1. My name is Andrea Mathie, Regulatory Supervisor of Brantley Telephone Co., Inc., (“Brantley”) a rural Local Exchange Carrier headquartered in Nahunta, GA. Brantley provides facilities-based telecommunications and broadband services to Nahunta and other communities in GA. I submit this Declaration in support of the Paperwork Reduction Act (“PRA”) comments of NTCA–The Rural Broadband Association, WTA -- Advocates for Rural Broadband, and JSI submitted in the above-captioned proceeding.
2. In general, Brantley County is a poor, rural county with very little industry. Nearly 22% of the population lives below the poverty line. The largest industry would be the school system. The land area is approx 440 sq miles with a population density of 41 people per sq mile. Brantley serves approximately 4,188 customers, 56 of whom receive Lifeline. Brantley has fewer than 100 employees.
3. This declaration is being submitted to share with the Office of Management and Budget (“OMB”) a more accurate reflection of the costs associated with implementing the Lifeline changes proposed by the Federal Communications Commission (“Commission”). Specifically, the changes associated with modifying the Lifeline snapshot date to use data from the first day of the month and the document retention changes far exceed those submitted by the Commission to OMB.
4. Currently, Brantley uses the billing data automatically generated from its billing system to not only run its monthly billing, but to also populate the FCC Form 497 for the same period. Under the new snapshot rule, the company will have to use a different subset of data and generate additional reports as billing is generally run several days before the end of the month (e.g., billing for December 1 is usually run on November 24 or 25).

5. Although it is too early to realize the full cost of implementing the change to how the FCC Form 497 is populated, based on how long it currently takes to prepare FCC Form 497, Brantley estimates that it will now take 1.5 to 2.5 hours to complete the Form 497 and cost \$100 per month in recurring expenses to populate the form each month.
6. Although Brantley currently has procedures in place to safeguard proprietary information for all of its customers and Lifeline applications, we estimate that the cost to retain proof of eligibility and identity (e.g., benefit cards, driver's licenses, passports, etc.) will cost far more than the \$40 per year estimated by the FCC. Indeed, our company estimates that it will cost \$120 in monthly recurring costs to comply with the new document retention rule.
7. Should the FCC determine in its current rulemaking that it will move in a different direction in regards to populating the FCC Form 497 (e.g., relying on NLAD) or that it will relieve eligible telecommunications carriers of its requirement to manage Lifeline enrollment, making the document retention rules moot, then Brantley Telephone Co., Inc. would have undergone these changes for naught.
8. The OMB should decline to approve the information collection as submitted.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my information and belief.

Executed By Andrea Mathie, Regulatory Supervisor on 11/16/2015 3:02:58 PM.



**Before the  
OFFICE OF MANAGEMENT AND BUDGET  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Notice of Information Collection	)	OMB Control No. 3060-0819
Pursuant to the Paperwork Reduction Act	)	
Lifeline and Link Up Reform	)	
and Modernization	)	

**PAPERWORK REDUCTION ACT COMMENTS  
OF  
NTCA–THE RURAL BROADBAND ASSOCIATION,  
WTA – ADVOCATES FOR RURAL BROADBAND, AND  
JSI**

**DECLARATION OF DAVID SHERLOCK, CUSTOMER SERVICE MANAGER OF  
INTERSTATE 35 TELEPHONE CO.**

1. My name is David Sherlock, Customer Service Manager of Interstate 35 Telephone Co. (“Interstate 35”) a rural Local Exchange Carrier headquartered in Truro, IA. Interstate 35 provides facilities-based telecommunications and broadband services to Truro and other communities in IA. I submit this Declaration in support of the Paperwork Reduction Act (“PRA”) comments of NTCA–The Rural Broadband Association, WTA -- Advocates for Rural Broadband, and JSI submitted in the above-captioned proceeding.
2. In general, We provide service to rural communities composed of commuters to the city for work and agriculture. Interstate 35 serves approximately 1,483 customers, six of whom receive Lifeline. Interstate 35 has fewer than 25 employees.
3. This declaration is being submitted to share with the Office of Management and Budget (“OMB”) a more accurate reflection of the costs associated with implementing the Lifeline changes proposed by the Federal Communications Commission (“Commission”). Specifically, the changes associated with modifying the Lifeline snapshot date to use data from the first day of the month and the document retention changes far exceed those submitted by the Commission to OMB.
4. Currently, Interstate 35 uses the billing data automatically generated from its billing system to not only run its monthly billing, but to also populate the FCC Form 497 for the same period. Under the new snapshot rule, the company will have to use a different subset of data and generate additional reports as billing is generally run several days before the end of the month (e.g., billing for December 1 is usually run on November 24 or 25).
5. Although it is too early to realize the full cost of implementing the change to how the

FCC Form 497 is populated, based on how long it currently takes to prepare FCC Form 497, Interstate 35 estimates that it will \$60 per month in recurring expenses to seek reimbursement for our six Lifeline customers, which exceeds the monthly reimbursement.

6. Although Interstate 35 currently has procedures in place to safeguard proprietary information for all of its customers and Lifeline applications, we estimate that the cost to retain proof of eligibility and identity (e.g., benefit cards, driver's licenses, passports, etc.) will cost far more than the \$40 per year estimated by the FCC. Indeed, our company estimates that it will cost \$3.33 in monthly recurring costs to comply with the new document retention rule.
7. Should the FCC determine in its current rulemaking that it will move in a different direction in regards to populating the FCC Form 497 (e.g., relying on NLAD) or that it will relieve eligible telecommunications carriers of its requirement to manage Lifeline enrollment, making the document retention rules moot, then Interstate 35 Telephone Co. would have undergone these changes for naught.
8. The OMB should decline to approve the information collection as submitted.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my information and belief.

Executed By David Sherlock, Customer Service Manager on 11/17/2015 9:59:49 AM.

**Before the  
OFFICE OF MANAGEMENT AND BUDGET  
Washington, D.C. 20554**

In the Matter of	)	
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Notice of Information Collection	)	OMB Control No. 3060-0819
Pursuant to the Paperwork Reduction Act	)	
Lifeline and Link Up Reform	)	
and Modernization	)	

**PAPERWORK REDUCTION ACT COMMENTS  
OF  
NTCA–THE RURAL BROADBAND ASSOCIATION,  
WTA – ADVOCATES FOR RURAL BROADBAND, AND  
JSI**

**DECLARATION OF STACI MALIKOWSKI, CFO, OF ARVIG ENTERPRISES, INC.**

1. My name is Staci Malikowski, CFO of Arvig Enterprises, Inc. (“Arvig”), a rural Local Exchange Carrier headquartered in Perham, MN. Arvig provides facilities-based telecommunications and broadband services to Perham and other communities in MN. I submit this Declaration in support of the Paperwork Reduction Act (“PRA”) comments of NTCA–The Rural Broadband Association, WTA -- Advocates for Rural Broadband, and JSI submitted in the above-captioned proceeding.
2. Arvig is located in rural Minnesota. Our territory includes plains, valleys and tribal reservations. Our customers range from farmers to progressive businesses, young and elderly. We serve in vacation areas and experience seasonal changes in revenue and build-out. Our customers demographics vary widely and includes tribal lands. Arvig serves approximately 56,187 customers, 1,871 of whom receive Lifeline (including 187 tribal Lifeline customers).
3. This declaration is being submitted to share with the Office of Management and Budget (“OMB”) a more accurate reflection of the costs associated with implementing the Lifeline changes proposed by the Federal Communications Commission (“Commission”). Specifically, the changes associated with modifying the Lifeline snapshot date to use data from the first day of the month and the document retention changes far exceed those submitted by the Commission to OMB.
4. Although Arvig currently has procedures in place to safeguard proprietary information for all of its customers and Lifeline applications, we estimate that the cost to retain proof of eligibility and identity (e.g., benefit cards, driver’s licenses, passports, etc.) will cost far more than the \$40 per year estimated by the FCC. Indeed, our company estimates that it will cost \$50.85 in monthly recurring costs to comply with the new data retention rule.

5. Should the FCC determine in its current rulemaking that it will relieve eligible telecommunications carriers of its requirement to manage Lifeline enrollment, making the document retention rules moot, then Arvig Enterprises, Inc. would have undergone these changes for naught.
6. The OMB should decline to approve the information collection as submitted.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my information and belief.

Executed By Staci Malikowski, CFO on 11/17/2015 12:48:59 PM.

**Before the  
OFFICE OF MANAGEMENT AND BUDGET  
Washington, D.C. 20554**

In the Matter of	)	
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Notice of Information Collection	)	OMB Control No. 3060-0819
Pursuant to the Paperwork Reduction Act	)	
Lifeline and Link Up Reform	)	
and Modernization	)	

**PAPERWORK REDUCTION ACT COMMENTS  
OF  
NTCA–THE RURAL BROADBAND ASSOCIATION,  
WTA – ADVOCATES FOR RURAL BROADBAND, AND  
JSI**

**DECLARATION OF KATHIE MUNSON, REVENUE REQUIREMENTS  
COORDINATOR, OF CITIZENS TELEPHONE COMPANY OF HIGGINSVILLE,  
MISSOURI**

1. My name is Kathie Munson, Revenue Requirements Coordinator of Citizens Telephone Company of Higginsville, Missouri (“Citizens MO”), a rural Local Exchange Carrier headquartered in Higginsville, MO. Citizens MO provides facilities-based telecommunications and broadband services to Higginsville and other communities in MO. I submit this Declaration in support of the Paperwork Reduction Act (“PRA”) comments of NTCA–The Rural Broadband Association, WTA -- Advocates for Rural Broadband, and JSI submitted in the above-captioned proceeding.
2. Citizens MO serves three exchanges located approximately 50 miles east of Kansas City, Missouri. Citizens MO’s subscribers are located in and around the rural towns of Higginsville, Corder, Mayview, and Aullville. Citizens Telephone Company’s service area is extremely rural in nature with the residential subscriber base consisting of agricultural, low-income, and elderly residents and the business subscriber base is centered on agriculture or smaller independent often family owned businesses. Citizens MO serves approximately 2,852 customers, 135 of whom receive Lifeline. Citizens MO has fewer than 25 employees.
3. This declaration is being submitted to share with the Office of Management and Budget (“OMB”) a more accurate reflection of the costs associated with implementing the Lifeline changes proposed by the Federal Communications Commission (“Commission”). Specifically, the changes associated with modifying the Lifeline snapshot date to use data from the first day of the month and the document retention changes far exceed those submitted by the Commission to OMB.
4. Currently, Citizens MO uses the billing data automatically generated from its billing system to not only run its monthly billing, but to also populate the FCC Form 497 for the same period. Under the new snapshot rule, the company will have to use a different

subset of data and generate additional reports as billing is generally run several days before the end of the month (e.g., billing for December 1 is usually run on November 25 or at the latest November 27). The key is that the billing system works on a billing period concept and trying to get accurate data on any other timeframe is problematic. This is especially crucial when responding to a PQA that can come a year or two after the fact.

5. Although it is too early to realize the full cost of implementing the change to how the FCC Form 497 is populated, based on how long it currently takes to prepare FCC Form 497, Citizens MO estimates that it will now take 2.5 to 3.5 hours and cost \$120 per month in recurring expenses to modify the snapshot date it uses to populate the form each month.
6. Although Citizens MO currently has procedures in place to safeguard proprietary information for all of its customers and Lifeline applications, we estimate that the cost to retain proof of eligibility and identity (e.g., benefit cards, driver's licenses, passports, etc.) will cost far more than the \$40 per year estimated by the FCC. Indeed, our company estimates that it will cost \$90 per year in recurring costs.
7. Should the FCC determine in its current rulemaking that it will move in a different direction in regards to populating the FCC Form 497 (e.g., relying on NLAD) or that it will relieve eligible telecommunications carriers of its requirement to manage Lifeline enrollment, making the document retention rules moot, then Citizens MO would have undergone these changes for naught.
8. The OMB should decline to approve the information collection as submitted.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my information and belief.

Executed By Kathie Munson, Revenue Requirements Coordinator on 11/17/2015 1:24:25 PM.

**Before the  
OFFICE OF MANAGEMENT AND BUDGET  
Washington, D.C. 20554**

In the Matter of	)	
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Notice of Information Collection	)	OMB Control No. 3060-0819
Pursuant to the Paperwork Reduction Act	)	
Lifeline and Link Up Reform	)	
and Modernization	)	

**PAPERWORK REDUCTION ACT COMMENTS  
OF  
NTCA–THE RURAL BROADBAND ASSOCIATION,  
WTA – ADVOCATES FOR RURAL BROADBAND, AND  
JSI**

**DECLARATION OF IRENE GARCIA, CUSTOMER SERVICE/INVENTORY  
MANAGER OF THE RINGGOLD TELEPHONE COMPANY**

1. My name is Irene Garcia, Customer Service/Inventory Manager of The Ringgold Telephone Company (“Ringgold”), a rural Local Exchange Carrier headquartered in Ringgold, GA. Ringgold provides facilities-based telecommunications and broadband services to Ringgold and other communities in Georgia. I submit this Declaration in support of the Paperwork Reduction Act (“PRA”) comments of NTCA–The Rural Broadband Association, WTA -- Advocates for Rural Broadband, and JSI submitted in the above-captioned proceeding.
2. Ringgold Telephone Company serves a geographic area in Catoosa County, Ga that is mountainous and rocky. The rock soil of Taylor’s Ridge, part of the Valley and Ridge geography, are visible from Interstate 75, which runs through Ringgold Gap in northwest Georgia. The ridges of the area are hard layers of sandstone and chert, while the valleys are composed of softer shale and limestone. Part of our service area includes the Chattahoochee National Forest. We serve approximately 8300 access lines in a 122 sq. mile area of Catoosa County. Catoosa County is a bedroom community to Chattanooga, TN. However 2/3 of the county is rural. The estimated median household income in 2013 was \$46,143. The percentage of people in Catoosa County living below the poverty level from 2008-2012 according the 2013 census is 12.3 % of the population. Ringgold serves approximately 7,200 customers, 40 of whom receive Lifeline. Ringgold has fewer than 100 employees.
3. This declaration is being submitted to share with the Office of Management and Budget (“OMB”) a more accurate reflection of the costs associated with implementing the Lifeline changes proposed by the Federal Communications Commission (“Commission”). Specifically, the changes associated with modifying the Lifeline snapshot date to use data from the first day of the month and the document retention changes far exceed those submitted by the Commission to OMB.

4. Currently, Ringgold uses the billing data automatically generated from its billing system to not only run its monthly billing, but to also populate the FCC Form 497 for the same period. Under the new snapshot rule, the company will have to use a different subset of data and generate additional reports as billing is generally run several days before the end of the month (e.g., billing for December 1 is usually run on November 24 or 25).
5. Although it is too early to realize the full cost of implementing the change to how the FCC Form 497 is populated, based on how long it currently takes to prepare FCC Form 497, Ringgold estimates that it will cost \$40 per month in recurring expenses to prepare FCC Form 497; however additional system reporting will be the major cost consideration. At this time, the data is captured based on a monthly billing cycle. New reports would need to be created to capture the data accordingly. The time spent on creating a new report cannot be determined without seeing the requirements.
6. Although Ringgold currently has procedures in place to safeguard proprietary information for all of its customers and Lifeline applications, it is estimated that the cost to retain proof of eligibility and identity (e.g., benefit cards, driver's licenses, passports, etc.) will cost far more than the \$40 per year estimated by the FCC. Indeed, our company estimates that it will cost approximately \$5.00 in monthly recurring costs to comply with the new document retention rule.
7. Should the FCC determine in its current rulemaking that it will move in a different direction in regards to populating the FCC Form 497 (e.g., relying on NLAD) or that it will relieve eligible telecommunications carriers of its requirement to manage Lifeline enrollment, making the document retention rules moot, then The Ringgold Telephone Company would have undergone these changes for naught.
8. The OMB should decline to approve the information collection as submitted.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my information and belief.

Executed By Irene Garcia, Customer Service/Inventory Manager on 11/19/2015 2:54:26 PM.



**Before the  
OFFICE OF MANAGEMENT AND BUDGET  
Washington, D.C. 20554**

In the Matter of	)	
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Notice of Information Collection	)	OMB Control No. 3060-0819
Pursuant to the Paperwork Reduction Act	)	
Lifeline and Link Up Reform	)	
and Modernization	)	

**PAPERWORK REDUCTION ACT COMMENTS  
OF  
NTCA–THE RURAL BROADBAND ASSOCIATION,  
WTA – ADVOCATES FOR RURAL BROADBAND, AND  
JSI**

**DECLARATION OF DAVE OSBORN, CEO OF VALLEY TELEPHONE  
COOPERATIVE, INC.**

1. My name is Dave Osborn, CEO of Valley Telephone Cooperative Inc. (“Valley”), a rural Local Exchange Carrier headquartered in Raymondville, TX. Valley provides facilities-based telecommunications and broadband services to Raymondville and other communities in Texas. I submit this Declaration in support of the Paperwork Reduction Act (“PRA”) comments of NTCA–The Rural Broadband Association, WTA -- Advocates for Rural Broadband, and JSI submitted in the above-captioned proceeding.
2. In general, Valley Telephone Cooperative covers approximately 7,300 square miles with 5,200 route miles of buried fiber optic and copper cable, from Rio Grande City to Brownsville to the northern areas surrounding Dilley, Texas, a community located southwest of San Antonio. Valley Telephone Cooperative serves rural and economically underserved areas. Valley serves approximately 3,679 customers, 242 of whom receive Lifeline. Valley has fewer than 200 employees.
3. This declaration is being submitted to share with the Office of Management and Budget (“OMB”) a more accurate reflection of the costs associated with implementing the Lifeline changes proposed by the Federal Communications Commission (“Commission”). Specifically, the changes associated with modifying the document retention rules far exceed those submitted by the Commission to OMB.
4. Although Valley currently has procedures in place to safeguard proprietary information for all of its customers and Lifeline applications, we estimate that the cost to retain proof of eligibility and identity (e.g., benefit cards, driver’s licenses, passports, etc.) will cost far more than the \$40 per year estimated by the FCC. Indeed, our company estimates that it will cost \$75 in monthly recurring costs and an additional \$15,000 for the purchase, installation and configuration of hardware to

maintain electronic records. This cost covers the purchase of PC workstation, data storage, scanner and associated equipment and materials to maintain electronic records.

5. Should the FCC determine that it will relieve eligible telecommunications carriers of its requirement to manage Lifeline enrollment, making the document retention rules moot, then Valley Telephone Cooperative Inc. would have undergone these changes for naught.
6. The OMB should decline to approve the information collection as submitted.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my information and belief.

Executed By Dave Osborn, CEO on 11/24/2015 7:11:51 PM.