



525 Junction Rd
Madison, WI 53717
www.tdstelecom.com

January 31, 2019

Via UPS

The Honorable Walter Thomas
Alabama Public Service Commission
100 North Union Street
Montgomery, AL 36104

RE: FCC Form 555 Annual Lifeline Eligible Telecommunications Carrier Certification Form
for TDS Telecom - **Butler Telephone Company, Inc.**

Dear Mr. Thomas:

Attached please find two copies of TDS Telecommunications LLC's Annual Lifeline Eligible Telecommunications Carrier Certification Form (FCC Form 555) which was filed with the Universal Service Administrative Company ("USAC") on January 29, 2019.

TDS' FCC Form 555 included the Affiliated SACs in our filing with USAC. Due to a USAC system issue, the affiliate information does not appear in the certified forms. We are attaching a separate affiliate list with a copy of our certified Form 555 for this state notification.

If you have any questions concerning this matter or regarding the attached information, please contact me at 608-664-2415 or via e-mail at nicole.mauritz@tdstelecom.com.

Sincerely,


Nicole Mauritz
TDS Telecommunications LLC
Regulatory Compliance Manager

Attachments

cc: Tom McCabe
Mac McArthur

Annual Lifeline Eligible Telecommunications Carrier Certification Form All carriers must complete all or portions of all sections Form must be submitted to USAC and filed with the Federal Communications Commission

IMPORTANT: PLEASE READ INSTRUCTIONS FIRST

Deadline: January 31st (Annually)

250284 <hr/> Study Area Code (SAC) <i>(An Eligible Telecommunications Carrier (ETC) must provide a certification form for each SAC through which it provides Lifeline service).</i>	143001537 <hr/> Service Provider Identification Number (SPIN)
2018 <hr/> Recertification Year	AL <hr/> State
N/A <hr/> DBA, Marketing, or Other Branding Name <i>(If same as ETC name, list "N/A" Do <u>not</u> leave blank)</i>	Butler Telephone Company Inc. <hr/> ETC Name TDS Telecommunications Corporation <hr/> Holding Company Name <i>(If same as ETC name, list "N/A" Do not leave blank)</i>

Does the reporting company have affiliated ETCs?

Yes No

Provide a list of all ETCs that are affiliated with the reporting ETC, using page 4 and additional sheets if necessary. Affiliation shall be determined in accordance with Section 3(2) of the Communications Act. That Section defines "affiliate" as "a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person." 47 U.S.C. § 153(2). See also 47 C.F.R. § 76.1200.

Affiliated ETC's SAC	Affiliated ETC's Name
-- See attached worksheet -	

ETCs Subject to the Non-Usage Requirements

All ETCs must complete the appropriate check-box. ETCs that do not assess and collect a monthly fee from their Lifeline subscribers are subject to the non-usage requirements. ETCs subject to the non-usage requirements must indicate the number of subscribers de-enrolled by month in Section 4. ETCs that only assess a fee but do not collect such fees are subject to the non-usage requirements and must also indicate the number of subscribers de-enrolled by month.

Is the ETC subject to the non-usage requirements? Yes No

If yes, record the number of subscribers de-enrolled for non-usage by month in Block Q below.

P	Q
Month	Subscribers De-Enrolled for Non-Usage
January	0
February	0
March	0
April	0
May	0
June	0
July	0
August	0
September	0
October	0
November	0
December	0
Total Subscribers	0

For purposes of this filing, an officer is an occupant of a position listed in the article of incorporation, articles of formation, or other similar legal document. An officer is a person who occupies a position specified in the corporate by-laws (or partnership agreement), and would typically be president, vice president for operations, vice president for finance, comptroller, treasurer, or a comparable position. If the filer is a sole proprietorship, the owner must sign the certification.

Initial Certification All ETCs must complete this section

I certify that the company listed above has certification procedures in place to:

- A) Review income and program-based eligibility documentation prior to enrolling a consumer in the Lifeline program, and that, to the best of my knowledge, the company was presented with documentation of each consumer’s household income and/or program-based eligibility prior to his or her enrollment in Lifeline; and/or
- B) Confirm consumer eligibility by relying upon access to a state database and/or notice of eligibility from the state Lifeline administrator prior to enrolling a consumer in the Lifeline program.

I am an officer of the company named above. I am authorized to make this certification for the Study Area Code listed above.

Initial AKM

Minimum Service Level

I certify that the company listed above is in compliance with the minimum service levels set forth in the 47 CFR Section 54.408.

I am an officer of the company named above. I am authorized to make this certification for the SACs listed above.

Initial AKM

Annual Recertification

Do not leave empty blocks. If an ETC has nothing to report in a block, enter a zero.

Report the number of Lifeline subscribers due for recertification by month (January-December)

- A. Subscribers eligible for recertification by anniversary month
- B. Subscribers de-enrolled prior to recertification attempts
- C. Total number of subscribers ETC is responsible for recertifying (A-B)

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year Total
A.	13	14	9	8	8	9	6	4	3	5	6	8	93
B.	1	1	0	0	0	0	0	0	0	0	0	0	2
C.	12	13	9	8	8	9	6	4	3	5	6	8	91

Recertification Methods

State of federal database

- D. Subscribers recertified through ETC access to state or federal database by anniversary month

Report the number of eligible subscribers verified through access to a state or federal database.

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year Total
D.	0	0	0	0	0	0	0	0	0	0	0	0	0

- E. Name of the data source(s) used to verify consumer eligibility:

ETC Direct Contact

- F. Subscribers contacted by ETC directly to recertify (You may also use this section to report subscriber initiated recertifications).

Report the number of Lifeline subscribers the ETC contacted directly to obtain recertification of eligibility

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year Total
F.	0	0	0	0	0	0	0	0	0	0	0	0	0

- G. Subscribers who failed to recertify through ETC direct outreach attempt

Report the number of Lifeline subscribers de-enrolled due to ineligibility or non-response to the ETC's outreach attempt.

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year Total
G.	0	0	0	0	0	0	0	0	0	0	0	0	0

H. Subscribers who recertified through ETC direct outreach attempt

Report the number of Lifeline subscribers that successfully recertified through ETC's outreach attempt.

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year Total
H.	0	0	0	0	0	0	0	0	0	0	0	0	0

Third Party

I. Subscribers whose eligibility was reviewed by state administrator, third party administrator, or USAC

Report the number of Lifeline subscribers contacted by a state administrator, third party administrator, or USAC for the purpose of recertification.

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year Total
I.	12	13	9	8	8	9	6	4	3	5	6	8	91

J. Name of third party administrator used to verify subscriber eligibility:

USAC

K. Subscribers de-enrolled as a result of a third party recertification attempt

Report the number of subscribers as a result of ineligibility or non-response to outreach from a state administrator, third party administrator, or USAC.

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year Total
K.	5	5	7	4	2	2	0	1	1	1	1	2	31

L. Subscribers who recertified through a state administrator, third party administrator, or USAC's recertification effort

Report the number of subscribers that recertified through a request from a state administrator, third party administrator, or USAC

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year Total
L.	7	8	2	4	6	7	6	3	2	4	5	6	60

Certification:

Recertification Method: Database

I certify that the company listed above has procedures in place to recertify consumer eligibility by relying on a database. I am an officer of the company named above. I am authorized to make this certification for the SAC(s) listed above.

Initial _____

Recertification Method: ETC

I certify that the company listed above has procedures in place to recertify the continued eligibility of all of its Lifeline subscribers, and that, to the best of my knowledge, the company obtained signed certifications from all subscribers attesting to their continuing eligibility for Lifeline. I am an officer of the company named above. I am authorized to make this certification for the SAC(s) listed above.

Initial _____

Recertification Method: Third Party

I certify that the company listed above has procedures in place to recertify consumer eligibility by relying on an administrator. I am an officer of the company named above. I am authorized to make this certification for the SAC(s) listed above.

Initial AKM

No Subscribers

I certify that my company did not claim federal low income support for any Lifeline subscribers for the current Form 555 data year. I am an officer of the company named above. I am authorized to make this certification for the SAC listed above.

Initial _____

$M = (G+K)$	$N = (D+F+I)$	$O = M/N*100$
Total number of subscribers de-enrolled as a result of recertification	Total number of subscribers ETC is responsible for recertifying	Percent of subscribers due for recertification who were de-enrolled
31	91	34.07%

Signature Block

By signing below, I certify that the company listed above is in compliance with all federal Lifeline certification procedures. I am an officer of the company named above. I am authorized to make this certification for the Study Area Code (SAC) listed above.

Signed,

Amanda Moore, Assistant Treasurer

Signature of Officer

amanda.moore@tdstelecom.com

Email Address of Officer

Nicole Mauritz

Person Completing This Certification Form

Amanda Moore, Assistant Treas

Printed Name and Title of Officer

Jan 29, 2019

Date

608.664.2415

Contact Phone Number

Attachment - TDS Telecommunications LLC Affiliates

SAC	Name
100005	Cobbosseecontee Telephone Company
100007	The Island Telephone Company
100010	Hampden Telephone Company
100011	Hartland & St. Albans Telephone Company
100024	Somerset Telephone Company
100031	Warren Telephone Company
100034	The West Penobscot Telephone and Telegraph Company
109002	U.S. Cellular
120045	Kearsarge Telephone Company
120047	Merrimack County Telephone Company
120049	Union Telephone Company
120050	Wilton Telephone Company, Inc.
123321	Hollis Telephone Company, Inc.
129002	NH #1 Rural Cellular, Inc. (U.S. Cellular)
140058	Ludlow Telephone Company
140061	Northfield Telephone Company
140062	Perkinsville Telephone Company, Inc.
150089	Deposit Telephone Company, Inc.
150092	Edwards Telephone Company, Inc.
150114	Oriskany Falls Telephone Corporation
150118	Port Byron Telephone Company
150129	Township Telephone Company, Inc.
150133	Vernon Telephone Company, Inc.
170183	Mahanoy & Mahantango Telephone Company
170206	Sugar Valley Telephone Company
190217	Amelia Telephone Corporation
190253	Virginia Telephone Company
193029	New Castle Telephone Co.
209005	Hardy Cellular Telephone Company (U.S. Cellular)
210338	Quincy Telephone Company (FL)
220338	Quincy Telephone Company (GA)
220346	Blue Ridge Telephone Company
220351	Camden Telephone and Telegraph Company, Inc.
220375	Nelson-Ball Ground Telephone Company
239006	Wilmington Cellular Telephone Company
240533	McClellanville Telephone Company, Inc.
240535	Norway Telephone Co. Inc
240544	St. Stephen Telephone Company
240551	Williston Telephone Company
250284	Butler Telephone Company, Inc.
250311	Oakman Telephone Company, Inc.
250314	Peoples Telephone Company, Inc.

SAC	Name
310677	Island Telephone Company
310685	Chatham Telephone Company
310726	Shiawassee Telephone Company
310738	Wolverine Telephone Company
320744	Camden Telephone Company, Inc.
320776	Communications Corporation of Indiana
320777	The Home Telephone Company of Pittsboro, Inc.
320778	Home Telephone Company, Inc.
320788	The Merchants and Farmers Telephone Company
320809	Communications Corporation of Southern Indiana
320816	S & W Telephone Company, Inc.
320829	Tipton Telephone Company, Inc.
320830	Tri-County Communications Corporation
320837	West Point Telephone Company
330844	Badger Telecom, LLC
330849	Black Earth Telephone Company, LLC.
330851	Bonduel Telephone Company, LLC.
330856	Burlington, Brighton & Wheatland Telephone Company, LLC
330859	Central State Telephone Company, LLC
330875	Dickeyville Telephone, LLC
330880	The Farmers Telephone Company, LLC
330881	Mid-Plains Telephone, LLC
330909	Midway Telephone Company, LLC
330914	EastCoast Telecom of Wisconsin, LLC
330915	Mosinee Telephone Company
330917	Mt. Vernon Telephone Company, LLC
330930	Grantland Telecom, LLC
330943	Riverside Telecom, LLC
330945	Scandinavia Telephone Company, LLC
330952	Southeast Telephone Co. of Wisconsin, LLC
330954	Stockbridge & Sherwood Telephone Company, LLC
330955	State Long Distance Telephone Company
330958	Tenney Telephone Company, LLC
330963	Utelco, LLC.
330968	Waunakee Telephone Company, LLC.
339007	United States Cellular Operating Company, LLC
359016	Farmers Cellular Telephone Company, Inc. (U.S. Cellular)
361350	Arvig Telephone Company
361362	Bridge Water Telephone Co.
361413	KMP d/b/a Mid-State Telephone Company
361433	Mid-State Telephone Company
361507	Winsted Telephone Company

Attachment - TDS Telecommunications LLC Affiliates

260411	Leslie County Telephone Company
260412	Lewisport Telephone Co.
260417	Salem Telephone Co.
280448	Calhoun City Telephone Company, Inc.
283301	Southeast Mississippi Telephone Company, Inc.
287449	Myrtle Telephone Company, Inc.
290559	Concord Telephone Exchange, Inc
290566	Humphreys County Telephone Company
290575	Tennessee Telephone Company
290578	Tellico Telephone Company, Inc.
299010	United States Cellular Operating Company of Knoxville
300585	Arcadia Telephone Company
300607	Continental Telephone Company
300613	Little Miami Communications Corporation
300645	Oakwood Telephone Company
300662	The Vanlue Telephone Company
310672	Communications Corporation of Michigan

431984	Oklahoma Communication Systems, Inc.
432010	Mid-America Telephone, Inc.
452171	Arizona Telephone Company
452174	Southwestern Telephone Company
462184	Delta County Tele-Comm, Inc.
462207	Strasburg Telephone Company
472230	Potlatch Telephone Company, Inc.
522404	Asotin Telephone Company (WA)
522427	Lewis River Telephone Company, Inc.
522430	McDaniel Telephone Company
529001	McDaniel Cellular Telephone Company (U.S. Cellular)
532404	Asotin Telephone Company (OR)
539002	USCOC of Oregon RSA #5, Inc. (U.S. Cellular)
542321	Happy Valley Telephone Company
542322	Hornitos Telephone Company
542323	Winterhaven Telephone Company