

**Before the
Office of Management and Budget
Washington, D.C. 20503**

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| In the Matter of |) | |
| |) | |
| Facilitating Implementation of Next Generation |) | OMB 3060–XXXX |
| 911 Services (NG911) |) | ICR Reference No: 202411-3060-015 |

**COMMENTS
OF
NTCA AND THE RLEC PARTIES**

I. INTRODUCTION AND SUMMARY

NTCA–The Rural Broadband Association (“NTCA”)¹ and various Rural Local Exchange Carrier (“RLEC”) groups (collectively “NTCA and the RLEC Parties”), hereby submit these comments in response to the Notice issued by the Federal Communications Commission (“FCC”) on January 21, 2025.² The Notice seeks comment on the FCC-sponsored information collection arising out of the agency’s July 19, 2024 Next Generation 911 (“NG911”) Report and Order.³ As required by the Paperwork Reduction Act (“PRA”), the FCC is seeking Office of Management and Budget (“OMB”) approval for the information collection. These comments address the *Supporting Statement* (and the burden estimates contained therein) filed by the FCC

¹ NTCA is an industry association composed of approximately 850 community-based companies and cooperatives that provide advanced communications services in rural America and more than 400 other firms that support or themselves are engaged in the provision of such services. The RLEC groups include the Rural Telephone Company Consortium (the “RTCC”), the South Carolina Telephone Coalition (the “SC Coalition”), the South Dakota Telecommunications Association, the Pennsylvania Telephone Association, the Kansas Rural Local Exchange Carriers (“KS RLECs”), the Communications Coalition of Kansas, the Iowa Communications Alliance, and Home Telephone ILEC, LLC. The companies represented by the RTCC, the SC Coalition and the KS RLECs are listed in Attachment A.

² Information Collection Being Submitted for Review and Approval to Office of Management and Budget, Notice and Request for Comments, FR ID 274218, 90 FR 7137 (Jan. 21, 2025) (“Notice”).

³ *Facilitating Implementation of Next Generation 911 Services (NG911)*, PS Docket No. 21-479, Report and Order, FCC 24-78 (rel. Jul. 19, 2024) (“*NG911 Report and Order*”). The information collection at issue herein arises from Sections 9.31(a)-(c) and 9.34 of FCC rules adopted in the *NG911 Report and Order*. *Id.*, Appendix A.

with the OMB to justify the information collection.⁴ These comments are directed primarily toward the Section 9.31(c) process that allows an Originating Service Provider (“OSP”)⁵ to challenge a State 911 Authority’s readiness to initiate Phase 1 or 2 of the FCC’s NG911 transition framework.⁶

The OMB should reject the information collection as submitted, and should instead require the FCC to submit supplemental information coupled with a further opportunity for interested parties to comment upon such submission. First, the *Supporting Statement’s* reliance on **uncited** guidelines to disregard altogether “in-house” costs⁷ in estimating the burden of

⁴ Federal Communications Commission, Facilitating Implementation of Next Generation 911 Services (NG911), Supporting Statement, ICR Reference No: 202411-3060-015 (Jan. 21, 2025), (“*Supporting Statement*”), available at: https://www.reginfo.gov/public/do/PRAViewDocument?ref_nbr=202411-3060-015.

⁵ The entities represented by NTCA and the RLEC Parties provide wireline voice service, among other services, in their rural communities and thus fall within the definition of “OSPs” as defined in paragraph 2 of the *NG911 Report and Order*. A state “911 Authority” is “[a] state, territorial, regional, Tribal, or local governmental entity that operates or has administrative authority over all or any aspect of a communications network for the receipt of 911 traffic at NG911 Delivery Points and for the transmission of such traffic from that point to [Public Safety Answering Points (“PSAPs”).” *NG911 Report and Order*, fn. 2. OSPs and state 911 Authorities are distinguished from “NG911 network providers,” the latter being entities that are in most states the third-party chosen by a state 911 Authority – via a state issued Request for Proposal – to provide NG911 service within a state.

⁶ Only Sections 9.31(c) and 9.34 are directly relevant to OSPs, and thus these comments are directed to the burden of these rules only. Sections 9.31(a) and (b) set forth the process by which state 911 Authorities must issue requests to OSPs to initiate the first and second steps of the *NG911 Report and Order’s* NG911 transition framework. Section 9.31(c) sets forth the process by which OSPs can challenge a state 911 Authority’s readiness to issue a Phase 1 or 2 request. Section 9.34 sets forth the process by which an OSP and a state 911 Authority can mutually agree to implement NG911 in a manner different from that set forth in the *NG911 Report and Order*. While NTCA and the RLEC Parties’ comments here and in response to the FCC’s initial burden estimate focus primarily upon Section 9.31(c), it should be noted that Section 9.34 will impose a burden – as defined by the PRA – on OSPs. Thus, the comments made herein as to Section 9.31(c) apply to Section 9.34 as well, particularly since the FCC provides no justification with respect to Section 9.34 as to the number of anticipated responses, the limited hours that have been estimated with respect to negotiating, finalizing, and filing such agreements, let alone the reliance not only on in-house expertise but outside consultant and attorney efforts with respect to the creation and submission of such agreements.

⁷ The *Supporting Statement’s* burden estimate distinguishes between “in-house” and “outside” costs. The *Supporting Statement* defines the former as a “full-time in-house regulatory staff employee that will be drafting and submitting petitions, replies, and/or notifications of mutual agreements to [the FCC].” *Supporting Statement*, p. 18. “Outside” costs are defined as “outside services to assist with recordkeeping, perform technical evaluations, and prepare and submit legal documents to [the FCC].” These are, in turn, defined to be outside attorneys and engineers. *Id.*, p. 19. NTCA and the RLEC Parties note that the FCC does not explain its rationale to limit “in-house” personnel to a “regulatory” individual when NG911 arrangements obviously include engineering and network expertise in addition to executive management oversight and related actions to secure such arrangements.

complying with the rules at issue is inconsistent with the due process rights of parties that will incur these costs should the referenced rules receive OMB approval. Second, the FCC's efforts to exclude in-house costs disregards proper and transparent administrative procedures and thus denies parties subject to such rules the ability to assess the guidelines upon which an agency relies in estimating the burdens of those rules. Third, even if such guidelines should exist, however, OMB regulations that speak directly to this matter do not permit the FCC to exclude from consideration "in-house" costs. Indeed, it would defy common sense for the OMB to direct an agency to assess the potential burdens of regulatory compliance only then to permit the agency to exclude from such estimates a substantial portion of entities' costs of compliance that come in the form of the work that employees must do to comply. Finally, the FCC's burden estimate as to "outside costs" is based on several numbers for which no source or explanation is provided,⁸ calling into question as well whether the FCC's burden estimate is "objectively supported" as the PRA requires.

II. THE INFORMATION COLLECTION SHOULD NOT BE APPROVED AS SUBMITTED; THE BURDEN ESTIMATE IS BASED ON THE IMPROPER EXCLUSION OF CERTAIN COSTS AS WELL AS UNEXPLAINED AND INEXPLICABLE TIME AND COST ESTIMATES IN THE *SUPPORTING STATEMENT*.

The OMB should not approve the information collection as submitted.⁹ A history of the burden estimates made by the FCC with respect to Section 9.31(c) is a good starting point for

⁸ *Id.*, p. 20 (estimating that the total cost burden to respondents associated with Sections 9.31(a)-(c) and 9.34 will be \$902,000 on an annual basis). The *Supporting Statement* indicates that this estimate is to account for OSPs hiring outside legal and engineering consultants to assist in filing petitions required by Section 9.31(c). *Id.*, p. 11. As discussed below, the \$902,000 is derived in part from an estimate of the number of OSPs that will file these challenges, the hours that will be incurred to do so, and the hourly costs of "outside" attorneys and engineers. And yet, no source or explanation is given for these three numbers.

⁹ NTCA and the RLEC Parties respectfully note that any concern that additional scrutiny of the FCC's *Supporting Statement* for compliance with the PRA or OMB regulations will thwart the NG911 transition would be misplaced. NTCA members and those of the RLEC Parties generally live and work in their rural communities and have every incentive to provide reliable access to public safety services. Moreover, like any OSP, these members have every

this discussion. Pursuant to this yet-to-be approved by OMB rule, an OSP in receipt of a Phase 1 or Phase 2 request from a state 911 Authority can file a challenge if it is believed that the latter cannot meet a condition required to issue such a request.¹⁰ In doing so, the OSP must explain the basis for its assertion that the state 911 Authority is not in compliance with the conditions precedent to making a Phase 1 or Phase 2 request. This challenge, in turn, requires an OSP to obtain and impart to the FCC information as to the physical network infrastructure that the state 911 Authority has, or does not have, in place for the operation of a NG911 network and to evaluate the technical capabilities of such infrastructure. OSPs must then under Section 9.31(c) incorporate the result of this information-gathering process and conclusions that arise from this process into a petition with a signed affidavit and pursuant to a rule that specifically notes that the affidavit must be “correct” under penalty of enforcement.

The FCC, in its initial burden estimate, asserted that participation in this challenge process would impose zero costs on OSPs.¹¹ As NTCA and the RLEC Parties stated in response, this assertion could not be justified, because “[e]ven if in-house staff were to perform some or all of these functions for an OSP, this would not be costless, given that those staff are presumably not volunteers and the time spent on such efforts comes at the opportunity cost of performing

incentive to ensure completion of 911 calls originated on their respective networks if for no other reason than to avoid liability at the state and federal level for the failure to do so. Thus, the OMB should heavily scrutinize the FCC’s *Supporting Statement* and should not be dissuaded from doing so based on unsupported assertions that additional delay would lead to “further stalling the eventual transition to lifesaving NG911 technology across the country.” *Id.*, p. 2.

¹⁰ Sections 9.31(a) and (b) outline the conditions under which a state 911 Authority can issue a Phase 1 or 2 request. The *NG911 Report and Order* sets forth the two-phased approach for the NG911 transition, discusses the process for a state 911 Authority issuing a Phase 1 or 2 request, the conditions that must be met to do so, and the challenge processes OSPs can undertake should they believe the request is not valid. *NG911 Report and Order*, ¶¶ 59-86.

¹¹ Information Collection Being Reviewed by the Federal Communications Commission, Notice, 89 FR 83012 (Oct. 15, 2024) (“60-Day Notice”) (“Total Annual Burden: 10,012 hours. Total Annual Cost: No Cost.”).

other functions.”¹² NTCA and the RLEC Parties went on to note that most OSPs will, **in addition to utilizing “in-house” resources**, “likely be compelled to seek the assistance of outside consultants and attorneys for guidance with rules as complex as these and especially given the need to submit supporting affidavits.”¹³

Even as the FCC now acknowledges that Sections 9.31(a)-(c) and 9.34 will impose costs on entities subject to these rules – and in fact the FCC now differentiates between “in-house”¹⁴ and “outside” attorney/engineering costs”¹⁵ – its burden analysis continues to fall short. The FCC inexplicably declares the “in-house” costs to be irrelevant to its burden estimate; specifically, the FCC asserts that these “in-house costs are identified in Section 12 of this Supporting Statement but are not reported as annual burden costs in Section 13, consistent with OMB guidelines.”¹⁶ No citation is provided, however, to support the assertion that the OMB has directed that “in-house” costs of regulatory compliance should be disregarded altogether in analysis of burdens under the PRA.

Referencing and relying entirely upon **unidentified guidelines** should compel the OMB to disapprove of the information collection as a straightforward matter of due process and proper transparent administrative procedure. An agency’s reliance upon uncited guidelines provides neither the public nor a party that will incur costs of compliance with the rule any opportunity to assess these guidelines or to comment on whether the FCC has faithfully adhered to them and

¹² Comments of NTCA and the RLEC Parties, PS Docket No. 21-479, OMB 3060–XXXX, FR ID 252551 (fil. Dec. 16, 2024), p. 5, available at: <https://www.ntca.org/sites/default/files/federal-filing/2024-12/ntca-rlec-121624.pdf>.

¹³ *Id.*

¹⁴ *Supporting Statement*, pp. 12-18. (finding that parties subject to the information collection will incur total annual “in-house” costs of \$738,666.56).

¹⁵ *Id.*, pp. 18-20.

¹⁶ *Id.*, p. 11.

can in fact exclude these costs. NTCA and the RLEC Parties respectfully submit that the OMB should not countenance such a process.

To the contrary, OMB **regulations** on their face require the inclusion of “in house” costs within a burden estimate. Section 1320.3(b)(1) of the OMB regulations defines a “burden” as, among other things, “the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency.”¹⁷ This includes “reviewing instructions,”¹⁸ “training personnel to be able to respond to a collection of information,”¹⁹ “searching data sources,”²⁰ “completing and reviewing the collection of information,”²¹ and “transmitting, or otherwise disclosing the information.”²² The functions that OSPs will undertake to challenge a Phase 1 or 2 request – obtaining and then including within a petition information as to the physical network infrastructure possessed by a state 911 Authority – fall squarely within these specific categories as identified in Section 1320.3(b)(1). Moreover, while OSPs will likely turn to the assistance of outside consultants and attorneys for guidance as to the analysis required to conform to Section 9.31(c), many of these functions will likely validate work performed by or will involve the work of “in house” staff as well.²³ As is self-evident by its wording, Section 1320.3(b)(1) of the OMB regulations requires federal agencies to

¹⁷ 5 C.F.R. § 1320.3(b)(1).

¹⁸ 5 C.F.R. § 1320.3(b)(1)(i).

¹⁹ 5 C.F.R. § 1320.3(b)(1)(vi).

²⁰ 5 C.F.R. § 1320.3(b)(1)(vii).

²¹ 5 C.F.R. § 1320.3(b)(1)(viii).

²² 5 C.F.R. § 1320.3(b)(1)(ix).

²³ The inclusion of “training” by the OMB within Section 1320.3(b)(1) as one of the functions that compose a “burden” only reinforces that the OMB rules do **not** limit burden estimates to the costs associated with retaining outside experts.

account for both “in-house” and “outside” costs in estimating regulatory burdens, yet the FCC has not done so for this information collection.

The FCC cannot rely on the “usual and customary” provision found in Section 1320.3(b)(2) of the OMB’s rules to exclude “in-house” costs for its total annual cost estimate. That provision directs agencies to exclude from its burden analysis respondents’ activity done “in the normal course of their activities,” an example given being “compiling and maintaining business records,” and where such activities are “usual and customary.”²⁴ The activities contemplated by Section 9.31(c) go far beyond compiling and maintaining business records and further are not functions these providers have ever specifically undertaken up to this point – in fact, they primarily involve efforts that would not have been undertaken but for the FCC’s adoption of the new rules here.

Moreover, any attempt to invoke the “usual and customary” exemption found in Section 1320.3(b)(2) by pointing to similar “valid request” requirements previously applicable to commercial mobile radio service (“CMRS”) providers is misplaced.²⁵ The OSPs represented by NTCA and the RLEC Parties are not CMRS providers, but rather are wireline OSPs as defined by the *NG911 Report and Order*²⁶ that have never been subject to the Section 9.10 “valid request” rules adopted in the CMRS context. Thus, no demonstration can be made that the tasks

²⁴ 5 C.F.R. § 1320.3(b)(2) (“The time, effort, and financial resources necessary to comply with a collection of information that would be incurred by persons in the normal course of their activities (e.g., in compiling and maintaining business records) will be excluded from the ‘burden’ if the agency demonstrates that the reporting, recordkeeping, or disclosure activities needed to comply are usual and customary.”).

²⁵ The *Supporting Statement* asserts that the FCC “adopted this type of valid request process in previous 911 transition rulemakings, including its rules for the transition to enhanced 911 (E911) and text-to-911.” *Supporting Statement*, fn. 16. The *Supporting Statement* points to certain sections of Section 9.10 of the FCC’s rules. *Id.* Section 9.10(a), entitled “Scope of Section” states that “the following requirements of paragraphs (a) through (t) of this section are only applicable to CMRS providers.” 47 C.F.R. § 9.10(a).

²⁶ As noted above, the entities represented by NTCA and the RLEC Parties provide wireline voice service, among other services offered to their rural communities, and thus fall within the definition of “OSPs” as defined in paragraph 2 of the *NG911 Report and Order*.

required of OSPs filing a challenge under Section 9.31(c) are “usual and customary” for wireline OSPs as defined by the *NG911 Report and Order*.

Additional unexplained assertions in the *Supporting Statement* are worthy of further OMB review and inquiry as well. By way of example, in estimating the “outside” costs the FCC asserts OSPs will incur to file a Section 9.31(c) challenge, the *Supporting Statement* asserts that (1) over the three-year period the information collection will be in place, 5% of OSPs will file a challenge under Section 9.31(c),²⁷ (2) these OSPs will incur 40 hours per respondent to do so,²⁸ and (3) these OSPs will incur attorneys’ fees of \$300 per hour and engineering costs of \$250 per hour.²⁹ Critically, (1) no source is offered for these three sets of numbers and (2) no explanation is given as to how the FCC arrived at these estimates. Yet these hourly figures ultimately form the basis of the \$902,000 annual cost burden estimate.³⁰

Beyond raising the same due process concerns as noted above with respect to reliance on uncited OMB guidelines, these FCC estimates run afoul of the PRA, which explicitly directs

²⁷ *Supporting Statement*, p. 15.

²⁸ *Id.* Relevant to the need for supplemental information (*see also infra* fn. 32), the *Supporting Statement* reduces the estimated burden in number of hours to 9,932 on an annual basis, where the original estimate was 10,012 hours. *Id.*, p. 11. In doing so the *Supporting Statement* states that “[a]s part of the 60-Day Notice estimated burden of 10,012 hours, the Commission had previously estimated that OSPs would file petitions challenging 5% of 911 Authority requests for NG911 service for the basis of its burden calculation. To allow the Commission to better estimate the number of respondents that would be affected, the Commission instead estimates that 5% of OSPs would file challenge petitions against 911 Authority requests for NG911 service.” *Id.* No explanation beyond this is provided as to how these numbers, that also form the basis of the \$902,000 cost estimate, were calculated.

²⁹ *Id.*, p. 19.

³⁰ The *Supporting Statement*’s estimation that 5% of OSPs will participate in the Section 9.31(c) challenge process translates to 41 OSPs participating. *Id.*, p. 15. That number is multiplied by the number of hours the FCC estimates will be consumed by outside attorneys and engineers, and then multiplied by the estimated hourly rate of those attorneys/engineers, to arrive at the annual “outside” cost estimate. Of the \$902,000 in “outside” costs, \$451,000 is, according to the *Supporting Statement*, attributed to OSPs participating in the challenge process, \$225,500 is attributed to state 911 Authorities’ opposition filings responding to OSPs’ challenges, and \$225,500 is attributed to OSPs’ responses to those state 911 Authority oppositions. *Id.*, pp. 19-20.

agencies to create a “specific, objectively supported estimate of [the] burden”³¹ of compliance with rules subject to that statute. Absent the provision of **any** source data from which the FCC’s burden estimates was derived, or even a basic explanatory statement indicating how the agency arrived at the numbers referenced above, neither the OMB nor parties subject to the information collection can evaluate whether the FCC’s estimate is in fact “objectively supported” or based upon numbers made out of “whole cloth.”³² Moreover, even as the FCC has taken a step forward in acknowledging that any costs will be imposed here – as compared to the \$0 cost of compliance estimated earlier in this proceeding – such an acknowledgement simply cannot end the inquiry. Objectively supported burden estimates must be made for any burden that agency regulations subject to the PRA will impose, and the FCC has failed to meet that standard for this information collection.

The PRA’s purpose is to “minimize the paperwork burden for individuals, small businesses ... resulting from the collection of information by or for the Federal Government.”³³ To minimize the paperwork burden, one must properly and transparently estimate the burden using realistic analyses based on clear evidence. Certainly, an estimate driven in no small part by references to uncited sources that conflict on their face with OMB regulations is cause to question the veracity of such an estimate. The concept of good and efficient government should

³¹ 44 U.S.C. § 3506 (c)(1)(A)(iv).

³² On its face, one aspect of the FCC’s burden estimates appears to be finely honed. For example, the *Supporting Statements*’ estimated annual burden in terms of hours represents approximately a 1% reduction from the FCC’s initial estimate. Compare *60-Day Notice*, 89 FR 83012 (estimating a “Total Annual Burden” of 10,012 hours) with *Supporting Statement*, p. 11 (estimating this number to be 9,932 hours on an annual basis). Thus, one could reasonably presume that the process by which the FCC made such a finely honed estimate adjustment was exacting and was made based on very specific and relevant data points. One should also expect that the particulars of this fine adjustment process can therefore be subject to public evaluation and scrutiny. That said, the number of hours contained within the Total Annual Burden reflected in the *Supporting Statement* suffers from the same problem as the \$902,000 annual cost estimate, as it too is based on the number of OSPs the FCC estimates will file a challenge, a number for which no source or explanation is given. *Supporting Statement*, pp. 15-18.

³³ 44 U.S.C. § 3501(1).

compel the OMB to thoroughly scrutinize the FCC's burden estimate to ensure that such estimate is in keeping with the purpose of the PRA. Strict adherence to the requirements of the PRA is of particular importance to the small OSPs that NTCA and the RLEC Parties represent. The typical member is a rural, small business confronting low subscriber densities and, at times, rugged terrain that drives up the cost to serve that member's community. These companies serve these communities with approximately 30 full-time employees, including executive teams, installers, technicians, customer service representatives, and regulatory compliance staff. Good faith attempts by the FCC to minimize burdens ensures staff and financial resources are directed toward the agency's ultimate mission of ensuring every American has access to reliable and affordable communications services. NTCA and the RLEC parties thus urge the OMB to scrutinize the estimates submitted here and to ensure compliance with the PRA is more than a "check the box" exercise.

III. CONCLUSION

For the reasons stated herein, the OMB should reject the information collection as submitted, and should instead require the submission of supplemental information by the FCC coupled with a further opportunity for interested parties to comment upon such submission. Such steps are necessary to ensure due process and the integrity of the OMB PRA approval process.

Respectfully submitted

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Attachment A

RLEC Members of the Rural Telephone Company Coalition

Arapahoe Telephone Company
Benkelman Telephone Company
Consolidated Telco, Inc.
Consolidated Telecom, Inc.
Consolidated Telephone Company
Curtis Telephone Company
Diller Telephone Company
Glenwood Telephone Membership Corporation
Glenwood Network Services
Great Plains Communications, LLC
Hamilton Telephone Company
Hardy Telecommunications, Inc. (WVA)
Hartington Telephone Company
Hartman Telephone Exchanges, Inc.
Hemingford Cooperative Telephone Company
Hershey Cooperative Telephone Company
K & M Telephone Company
Mainstay Communications
Nebraska Central Telephone Company
Northeast Nebraska Telephone Company
The North-Eastern Pennsylvania Telephone Company (PA)
Pierce Telephone Company, Inc.
Sodtown Communications, Inc.
Southeast Nebraska Communications, Inc.
Stanton Telephone Company
State Telephone Company (NY)
Three River Telco
Wauneta Telephone Company
Wilkes Telephone & Electric Company (GA)

¹All listed Companies operate within the State of Nebraska except as otherwise noted.

RLEC Members of the South Carolina Telephone Coalition

Chesnee Telephone Company
Comporium, Inc. (f/k/a Rock Hill Telephone Company)
TruVista Communications, Inc. (f/k/a The Chester Telephone Company)
Farmers Telephone Cooperative, Inc.
Ft. Mill Telephone Company d/b/a Comporium
Home Telephone ILEC, LLC
Horry Telephone Cooperative, Inc.
Lancaster Telephone Company d/b/a Comporium
Lockhart Telephone Company d/b/a TruVista
Palmetto Rural Telephone Cooperative, Inc.

Piedmont Rural Telephone Cooperative, Inc.
PBT Telecom d/b/a Comporium
Ridgeway Telephone Company d/b/a TruVista
Sandhill Telephone Cooperative, Inc.
West Carolina Rural Telephone Cooperative, Inc.

The Kansas RLECs

Madison Telephone, LLC
Cunningham Telephone Co., Inc.
The Golden Belt Telephone Association, Inc.
Haviland Telephone Co., Inc.
JBN Telephone Co., Inc.
Rainbow Telecommunications Association, Inc.
South Central Telephone Association, Inc.
Gorham Telephone Co., Inc.
Pioneer Telephone Association, Inc.
Peoples Telecommunications, LLC
Columbus Communications Services, LLC
H&B Communications, Inc.
Home Telephone Co. Inc.
LaHarpe Telephone Co., Inc.
Southern Kansas Telephone Co., Inc.
Totah Telephone Co., Inc.
Twin Valley Telephone, Inc.
Wamego Telecommunications Co., Inc.
Wilson Telephone Co., Inc.
Zenda Telephone Co., Inc.