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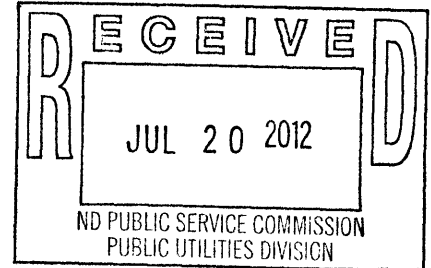
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July 19, 2012

PUBLIC SERVICE COMMISSION OF NORTH DAKOTA  
Attn: Patrick J. Fahn, Executive Secretary  
600 East Boulevard Avenue, Dept. 408  
Bismarck, ND 58505



RE: Dickey Rural Telephone Cooperative – Supplemental Filing  
Eligible Carrier Application – Case No. PU-12-73

Dear Mr. Fahn:

The documents sent herewith are being submitted by Dickey Rural Telephone Cooperative (“DRN” or “Dickey Rural”) for filing in Case No. PU-12-73. Sent herewith is a Supplement to Application for Expansion of Eligible Telecommunication Carrier Designated Geographical Study Area Demonstrating Compliance with 47 C.F.R. §§ 54.101 & 54.202. This Supplement to Application has attached to it the Five-Year Service Improvement Plan along with the map of the service areas. This Supplement to Application is meant to address the concerns voiced in your May 11, 2012 letter/email.

Dickey Rural’s position is that ETCs are not required by CFR Part 47 Subpart F or G to provide services supported by the schools and libraries and rural health care support mechanisms and that, instead, low income - Lifeline - is the only non-high cost support services that ETCs are obligated to provide.

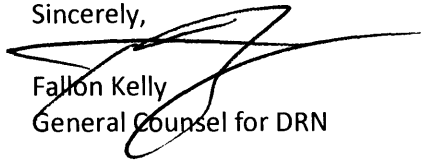
This matter was already noticed for hearing by the “Notice of Opportunity for Hearing” dated February 29, 2012. The deadline for comments and requests for hearing was April 13, 2012. There were no comments and there were no requests for hearing submitted. Since there were no comments and no requests for hearing, DRN respectfully requests that the Supplement to Application be made a part of the file and the matter be put on the Agenda and heard at the next regularly scheduled August 1, 2012 PSC date so that this matter may be decided and resolved as soon as possible.

An Order Granting Trade Secret Protection was issued in this matter on March 21, 2012 and the documents filed herewith are marked as “Confidential—Not for Public Inspection” with the further request that these documents be treated as confidential and not open for public inspection.

If you have any other concerns or questions, please do not hesitate to contact me so that any concerns or questions may be addressed to your satisfaction prior to this matter being decided upon.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read 'Fallon Kelly', written over the typed name.

Fallon Kelly  
General Counsel for DRN

**Case No. PU-12-73**

**Dickey Rural Telephone Cooperative – Supplement to Application for Expansion of Eligible Telecommunications Carrier Designated Geographical Study Area Demonstrating Compliance with 47 C.F.R. §§ 54.101 & 54.202**

Dickey Rural Telephone Cooperative (“DRTC”) has filed an Application for Expansion of Eligible Telecommunications Carrier Designated Geographical Study Area (“Application”) with the Public Service Commission of North Dakota as part of the process of merging Dickey Rural Communications (“DRC”) and Dickey Rural Access (“DRA”) into DRTC (hereinafter the consolidated entity is referred to as “DRT” or the “Company”).<sup>1</sup> DRTC, DRC and DRA each have been designated as eligible telecommunications carriers (“ETCs”) by the state of North Dakota.<sup>2</sup> As part of the Application, DRT hereby provides what is required of ETC applicants that seek ETC designation before the Federal Communications Commission as set forth in 47 C.F.R. §§ 54.101 and 54.202.

**I. Certification that DRT Will Comply with the Service Requirements Applicable to the Support it Receives**

According to 47 C.F.R. § 54.202(a)(1)(i), an applicant for ETC designation must certify that it will comply with the service requirements applicable to the support it receives. According to 47 C.F.R. § 54.101(b), in order to receive federal universal service support, an entity must offer voice telephony service as it is defined in 47 C.F.R. § 101(a). 47 C.F.R. § 54.101(a) defines voice telephony services as:

voice grade access to the public switched network or its functional equivalent; minutes of use for local service provided at no additional charge to end users; access to the emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911, to the extent the local government in an eligible carrier’s

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<sup>1</sup> Case No. PU-12-73.

<sup>2</sup> Pursuant to sections 69-09-05-12 and 69-09-05-12.1 of the North Dakota Administrative Code and section 49-21-01.7(12) of the North Dakota Century Code, DRTC, DRC and DRA annually file a report associated with their being certified as essential telecommunications carriers.

service area has implemented 911 or enhanced 911 systems; and toll limitation services to qualifying low-income consumers. . . .

DRTC, DRC and DRA each provide voice telephony services as defined in 47 C.F.R. § 54.101(a). Pursuant to 47 C.F.R. § 54.202(a)(1)(i), DRT hereby certifies that after DRC and DRA are merged into DRTC, the consolidated entity will continue to offer voice telephony services and will comply with the service requirements applicable to the support it receives.

**II. DRT's Five-Year Service Quality Improvement Plan**

Section 54.202 (a)(1)(ii) requires an applicant for ETC designation to submit a five-year plan that describes with specificity proposed improvements or upgrades to the applicant's network throughout its proposed service area. This rule also requires each applicant to estimate the area and population that will be served as a result of the improvements. Attached, as Attachment 1, is the five-year service quality improvement plan for DRT.

**III. Demonstration that DRT is able to Function in Emergency Situations**

47 C.F.R. § 54.202(a)(2) requires an applicant for ETC designation to demonstrate its ability to remain functional in emergency situations, "including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations."

DRT's network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). DRT can change call routing translations as needed to reroute

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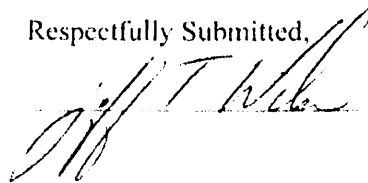
traffic around damaged facilities. Changing call routing translations will also allow DRT to manage traffic spikes throughout its network, as emergency situations require.

Specifically, each central office building is supplied with standby generators and battery back-up that enable the central office to keep running until power is restored so long as fuel is available, or until system changes are made to reroute traffic. The Company has battery backup at all office locations and in its electronic equipment sites. Length of run time is determined by the equipment serving the area and the number of customers working out of the equipment. Generators are installed at all Central Office locations. They will continue to run as long as the Company has access to propane.

**IV. Demonstration that DRT will Satisfy Applicable Consumer Protection and Service Standards**

47 C.F.R. 54.202(a)(3) requires an ETC applicant to demonstrate that it will satisfy applicable consumer protection and service quality standards. This rule states that "a commitment by wireless applicants to comply with the Cellular Telecommunications and Internet Association's Consumer Code for Wireless Service will satisfy this requirement. Other commitments will be considered on a case-by-case basis." DRTC, DRC and DRA are incumbent local exchange carriers that are subject to Chapter 69-09-05 of the North Dakota Administrative Code which establishes standards of service for local exchange companies. DRT hereby certifies that after DRC and DRA are merged into DRTC, the consolidated entity will continue to adhere to the standards of service as set forth in Chapter 69-09-05.

Respectfully Submitted,



Dated:

July 18, 2012

ATTACHMENT 1

Five-Year Service Improvement Plan

**A. Description of DRT's Service Area**

DRT serves the combined exchange areas of:

Ashley	Crete
Dickey	Edgeley
Ellendale	Forbes
Forman	Fort Ransom
Fredonia	Fullerton
Guelph	Gwinner
Jud	Kathryn
Kulm	LaMoure
Lisbon	Litchville
Marion	Merricourt
Milnor	Nelvik
Oakes	Venturia
Verona	

See attached map for the service areas.

**B. Use of Support**

Essentially, under the existing rules and processes, the federal support funds received by DRT and other incumbent rural telephone companies are, in fact, an integral part of the recovery of expenditures of rural incumbent local exchange carriers incurred in the provision, maintenance and upgrading of their provision of universal service. The Company depends upon its receipt and utilization of federal universal service support to provide rural telephone customers with affordable and quality telecommunications services.

**C. Planned Projects Over the Next Five Years**

**REDACTED**

**1. Projects to Be Accomplished 2013-2017**

**Estimated Regulated capital expenditures**

The projects below are planned throughout the study area. The total population affected is 19,100.

<b>DRT Additions to Plant</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>
Buildings and Land					
Central Office Additlons					
Circuit Equipment					
Cable & Wire Additions-FTTH					
Network Management					
Other Support Assets					
<b>Grand Total Plant Additions:</b>					

**Estimated Other capital expenditures**

<b>DRT Additions to Plant</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>
Video Electronics					
Managed Services					
<b>Grand Total Plant Additions:</b>					

**REDACTED**

**Estimated Maintenance and Depreciation**

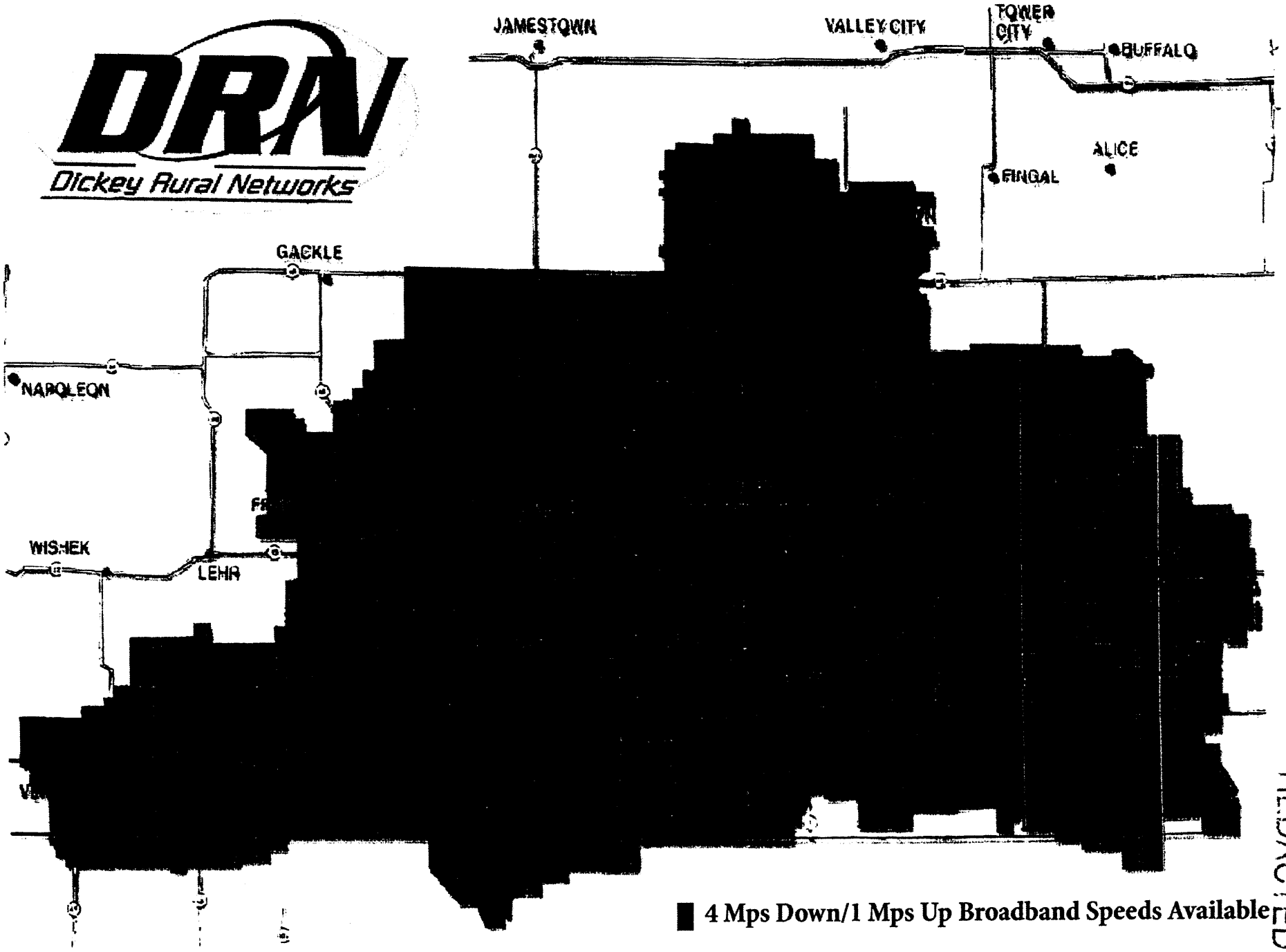
DRT Maintenance	2013	2014	2015	2016	2017
General Support					
Central Office					
Cable & Wire					
Network Operations					
Depreciation					
Customer Operations					
Corporation Operations					
<b>Grand Total Expenses:</b>					

**D. List of Anchor Institutions**

Anchor Institutions Currently Served	
Name	Address
SATRE MEMORIAL LIBRARY	PO BOX 225, Milnor ND 58060
ELLEDALE PUBLIC LIBRARY	PO BOX 267, Ellendale ND 58436
ASHLEY PUBLIC LIBRARY	PO BOX 185, Ashley ND 58413
LISBON PUBLIC LIBRARY	PO BOX 569, Lisbon ND 58054
FORMAN PUBLIC LIBRARY	PO BOX 382, Forman ND 58032
EDGELEY PUBLIC LIBRARY	PO BOX 218, Edgeley ND 58433
OAKES COMMUNITY HOSPITAL	1200 N 7 St, Oakes ND 58474
LISBON MEDICAL CENTER	PO Box 353, Lisbon ND 58054
ASHLEY MEDICAL CENTER	PO Box 450, Ashley ND 58413

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SARGENT CENTRAL PUBLIC SCHOOL	PO Box 289, Forman ND 58032
OAKES PUBLIC SCHOOL	804 Main Ave, Oakes ND 58474
NORTH SARGENT SCHOOL	PO Box 289, Gwinner ND 58040
MILNOR HIGH SCHOOL	PO Box 369, Milnor ND 58060
MARION PUBLIC SCHOOL	104 2 ST, Marion ND 58466
LITCHVILLE PUBLIC SCHOOL	304 6 AV, Litchville ND 58461
LISBON PUBLIC SCHOOL	PO Box 593, Lisbon ND 58054
SPRING CREEK COLONY SCHOOL	36562 102nd St, Forbes ND 58439
LAMOURE PUBLIC SCHOOL	105 6 AV SE, LaMoure ND 58458
KULM PUBLIC SCHOOL	PO Box G, Kulm ND 58456
FAIRVIEW COLONY SCHOOL	9644 74th St SE, LaMoure ND 58458
ELLEDALE PUBLIC SCHOOL	PO Box 400, Ellendale ND 58436
EDGELEY PUBLIC SCHOOL	PO Box 37, Edgeley ND 58433
ASHLEY SCHOOL DISTRICT	703 W Main St, Ashley ND 58413



■ 4 Mps Down/1 Mps Up Broadband Speeds Available

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