



Your business is our business.

7852 Walker Drive, Suite 200  
Greenbelt, Maryland 20770  
phone: 301-459-7590, fax: 301-577-5575  
internet: www.jsitel.com, e-mail: jsi@jsitel.com



VIA OVERNIGHT MAIL

June 30, 2017

Mr. Darrell Nitschke  
Executive Secretary  
North Dakota Public Service Commission  
600 East Boulevard Avenue, Twelfth Floor  
Bismarck, ND 58505-0480

**RE: Federal Communications Commission's 2017 ETC Annual Report**

Pursuant to Sections 54.313 and 54.422 of the Federal Communications Commission's Rules (47 C.F.R. §§ 54.313, 54.422), attached please find an original copy of the ETC Annual Report (FCC Form 481) that was filed with USAC and the FCC. The attached is submitted by JSI on behalf of Polar Communications Mutual Aid Corp. f/k/a Polar Telecommunications. An electronic copy of the redacted version has also been submitted.

Please note that some of the information included in the completed FCC Form 481 Report is confidential and proprietary. Confidential information has been placed in an envelope marked "PROTECTED INFORMATION - PRIVATE" and sealed.

Along with this filing you will find enclosed a copy of this transmittal letter marked "File Stamp Copy" to be stamped and returned to JSI as confirmation that the hard copies of this filing have been received by the Commission as well. Please return the stamped copy of this transmittal letter in the envelope provided for this purpose.

Please contact the undersigned if you have any questions.

Sincerely,

Cassandra Heyne, Consultant  
Authorized Representative for  
Polar Communications Mutual Aid Corp. f/k/a Polar  
Telecommunications

Enclosures

Shari Flanders, Polar Communications Mutual Aid Corp. f/k/a Polar Telecommunications

Echelon Building II, Suite 200  
9430 Research Blvd., Austin, TX 78759  
phone: 512-338-0473, fax: 512-346-0822

Eagandale Corporate Center, Suite 310  
1380 Corporate Center Curve, Eagan, MN 55121  
phone: 651-452-2660, fax: 651-452-1909

6849 Peachtree Dunwoody Road  
Bldg. B-3, Suite 200, Atlanta, GA 30328  
phone: 770-569-2105, fax: 770-410-1608

547 South Oakview Lane  
Bountiful, UT 84010  
phone: 801-294-4576, fax: 801-294-5124



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internet: www.jsitel.com, e-mail: jsi@jsitel.com

June 27, 2017

**Via Hand Delivery**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: WC Docket No. 14-58  
2017 ETC Annual Report of Polar Communications Mutual Aid Corp. f/k/a  
Polar Telecommunications  
Study Area Code 381614**

Dear Ms. Dortch:

On behalf of Polar Communications Mutual Aid Corp. f/k/a Polar Telecommunications ("Company"), JSI files the attached confidential version of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission's rules.<sup>1</sup> Company seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.<sup>2</sup> The redacted version is being filed this date via the FCC's Electronic Comment Filing System.

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall  
JSI Vice President  
301-459-7590  
[jkuykendall@jsitel.com](mailto:jkuykendall@jsitel.com)

<sup>1</sup> 47 C.F.R. §§ 54.313, 54.422.

<sup>2</sup> *Connect America Fund et al.*, WC Docket Nos. 10-90 and 14-58, Protective Order, DA 16-296 rel. March 22, 2016 (Protective Order). 47 C.F.R. § 54.313(f)(2).



<010> Study Area Code	381614
<015> Study Area Name	POLAR TELECOMM.
<020> Program Year	2018
<030> Contact Name: Person USAC should contact with questions about this data	Shari Flanders
<035> Contact Telephone Number: Number of the person identified in data line <030>	7012844343 ext.
<039> Contact Email Address: Email of the person identified in data line <030>	sflanders@polartel.com
Form Type	54.313 and 54.422



CONFIDENTIAL INFORMATION SUBJECT TO PROTECTIVE ORDER BEFORE THE FEDERAL COMMUNICATIONS COMMISSION

**(300) Unfulfilled Service Request  
Data Collection Form**

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010> Study Area Code

381614

<015> Study Area Name

POLAR TELECOMM.

<020> Program Year

2018

<030> Contact Name - Person USAC should contact regarding this data

Shari Flanders

<035> Contact Telephone Number - Number of person identified in data line <030>

7012844343 ext.

<039> Contact Email Address - Email Address of person identified in data line <030>

sflanders@polartel.com

<300> Unfulfilled service request (voice)

0

<310> Detail on attempts (voice)

\_\_\_\_\_

Name of Attached Document

<320> Unfulfilled service request (broadband)

0

<330> Detail on attempts (broadband)

\_\_\_\_\_

Name of Attached Document

(400) Number of Complaints per 1,000 customers Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
--	--

<b>&lt;010&gt;</b>	Study Area Code	381614
<b>&lt;015&gt;</b>	Study Area Name	POLAR TELECOMM.
<b>&lt;020&gt;</b>	Program Year	2018
<b>&lt;030&gt;</b>	Contact Name - Person USAC should contact regarding this data	Shari Flanders
<b>&lt;035&gt;</b>	Contact Telephone Number - Number of person identified in data line	7012844343 ext.
<b>&lt;039&gt;</b>	Contact Email Address - Email Address of person identified in data line	sflanders@polarcel.com
<b>&lt;400&gt;</b>	Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. <span style="float: right;">Offered only fixed voice</span>	
<b>&lt;410&gt;</b>	Complaints per 1000 customers for fixed voice	0.0
<b>&lt;420&gt;</b>	Complaints per 1000 customers for mobile voice	
<b>&lt;430&gt;</b>	Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. <span style="float: right;">Offered only fixed broadband</span>	
<b>&lt;440&gt;</b>	Complaints per 1000 customers for fixed broadband	0.0
<b>&lt;450&gt;</b>	Complaints per 1000 customers for mobile broadband	

**[500] Compliance With Service Quality Standards and Consumer Protection Rules  
Data Collection Form**

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010> Study Area Code	381614
<015> Study Area Name	POLAR TELECOMH
<020> Program Year	2018
<030> Contact Name - Person USAC should contact regarding this data	Shari Flanders
<035> Contact Telephone Number - Number of person identified in data line <030>	7012844343 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	sflanders@polartel.com
<500> Certify compliance with applicable service quality standards and consumer protection rules	Yes
	381614nd510.pdf
<510> Descriptive document for Service Quality Standards & Consumer Protection Rules Compliance	
<515> Certify compliance with applicable minimum service standards	

<b>(600) Functionality in Emergency Situations</b>	<b>OMB INFORMATION SUBJECT TO PROTECTIVE ORDER BEFORE THE FEDERAL COMMUNICATIONS COMMISSION</b>
<b>Data Collection Form</b>	<b>OMB Control No. 3060-0986/OMB Control No. 3060-0819</b>
	<b>July 2013</b>

<010> Study Area Code	381614
<015> Study Area Name	POLAR TELECOMM
<020> Program Year	2018
<030> Contact Name - Person USAC should contact regarding this data	Shari Flanders
<035> Contact Telephone Number - Number of person identified in data line <030>	7012844343 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	sflander@polartel.com
<600> Certify compliance regarding ability to function in emergency situations	Yes
<610> Descriptive document for Functionality in Emergency Situations	381614nd610.pdf











<010> Study Area Code 381614  
 <015> Study Area Name POLAR TELECOMM.  
 <020> Program Year 2018  
 <030> Contact Name - Person USAC should contact regarding this data Shari Flanders  
 <035> Contact Telephone Number - Number of person identified in data line <030> 7012844343 ext.  
 <039> Contact Email Address - Email Address of person identified in data line <030> sflanders@polartel.com

<1000> Voice services rate comparability certification Yes

<1010> Attach detailed description for voice services rate comparability compliance

\_\_\_\_\_  
 Name of Attached Document

Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau

<1020> Broadband comparability certification

<1030> Attach detailed description for broadband comparability compliance

\_\_\_\_\_  
 Name of Attached Document

**(1100) No Terrestrial Backhaul Reporting  
Data Collection Form**

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	381614
<015>	Study Area Name	POLAR TELECOMM.
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Shari Flanders
<035>	Contact Telephone Number - Number of person identified in data line <030>	7012844343 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	sflanders@polartel.com

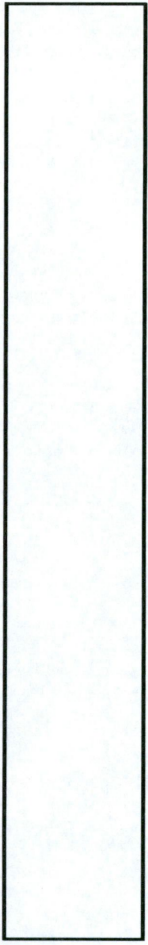
<1100> Certify whether terrestrial backhaul options exist (Y/N)

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

**(1200) Terms and Condition for Lifeline Customers  
Lifeline  
Data Collection Form**

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	381614
<015>	Study Area Name	POLAR TELECOMM.
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Shari Flanders
<035>	Contact Telephone Number - Number of person identified in data line <030>	7012844343 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	sflanders@polartel.com



Name of Attached Document

Link to Public Website HTTP <https://www.polarcomm.com/resources/phone-assistance-program/>

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,
- <1222> Details on the number of minutes provided as part of the plan,
- <1223> Additional charges for toll calls, and rates for each such plan.

(2005) Price Cap Costed Additional Documentation  
 Data Collection Form  
 Including Access to Business Records Affiliated with Price Cap Local Exchange Carriers  
 (2005) Form No. 1000  
 Date of Release: 03/01/2005  
 Version: 1.0

<010>	Study Area Code	381614
<015>	Study Area Name	POLAR TELECOMM.
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Shari Flanders
<035>	Contact Telephone Number - Number of person identified in data line <030>	7012844343 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	sflanders@polartel.com

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

**Incremental Connect America Phase I reporting**

- <2011> 3rd Year Certification 47 CFR §54.313(b)(1)(ii) - Note that for the July 2017 certification, this applies to Round 2 recipients of Incremental Support.
- <2022> Recipient certifies, representing year three after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients only.
- <2023> The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year three - 54.313(b)(2)(ii). Round 2 recipients only.
- <2024A> Round 2 Recipient of Incremental Support?
- <2024B> Attach list of census blocks indicating where funding was spent in year three - 54.313(b)(2)(ii). Round 2 recipients only.
- <2025A> Round 2 Recipient of Incremental Support?
- <2025B> Attach geocoded Information for Phase I milestone reports (Round 2 for year three) - Connect America Fund, WC Docket 10-90, Report and Order, FCC 13-73, paragraph 35 (May 22, 2013).
- <2015> 2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)

Name of Attached Document Listing Required Information

Name of Attached Document Listing Required Information

(2005) Price Cap Carrier Additional Documentation

Data Collection Form

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

**Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}**

<2016> Certification support used to build broadband

**Connect America Phase II Reporting {47 CFR § 54.313(e)}**

<2017A> Connect America Fund Phase II recipient?

<2017C> Total amount of Phase II support, if any, the price cap carrier used for capital expenditures in 2016.

<2018> Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(1)(ii)(A)

<2019> Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(1)(ii)(C)

Name of Attached Document Listing Required Information

(3005) Rate Of Return Carrier Additional Documentation  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	381614
<015>	Study Area Name	POLAR TELECOMM.
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Shari Flanders
<035>	Contact Telephone Number - Number of person identified in data line <030>	7012844343 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	sflanders@polartel.com

Select from the drop down menu or check the boxes below to note compliance with 54.313(f)(1). Privately held carriers must ensure compliance with the financial reporting requirements set forth in 47 CFR 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

Progress Report on 5 Year Plan  
Carrier certifies to 54.313(f)(1)(iii)

(3009)

Yes - Attach Certification

(3010A) Certification of Public Interest Obligations {47 CFR § 54.313(f)(1)(i)}

(3010B) Please Provide Attachment Name of Attached Document Listing Required Information

(3012A) Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)} No - No New Community Anchors

(3012B) Please Provide Attachment Name of Attached Document Listing Required Information

(3013) Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)}  (Yes)  (No)

(3014) If yes, does your company file the RUS annual report (Yes/No)  (Yes)  (No)

Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)

(3016) Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows

(3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation Name of Attached Document Listing Required Information

(3018) If the response is no on line 3014, is your company audited? (Yes/No)  (Yes)  (No)

If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:

(3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers

(3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3021) Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit. If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:

(3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers

(3023) Underlying information subjected to a review by an independent certified public accountant

(3024) Underlying information subjected to an officer certification.

(3025) Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows

(3026) Attach the worksheet listing required information Name of Attached Document Listing Required Information

(4005) Rural Broadband Experiment Additional Documentation  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	381614
<015>	Study Area Name	POLAR TELECOMM.
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Shari Flanders
<035>	Contact Telephone Number - Number of person identified in data line <030>	7012844343 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	sflanders@polartel.com

**4005 Rural Broadband Experiment**

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

**Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)**

Please address Line 4001 regarding compliance with the Commission's public interest obligations. All RBE participants must provide a response to Line 4001.

**4001.** Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

**Community Anchor Institutions – FCC 14-98 (paragraph 79)**

**4003a.** RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

**If yes to 4003A, please provide a response for 4003B.**

**4003b.** Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year. Name of Attached Document Listing Required Information \_\_\_\_\_

**Broadband Deployment Locations – FCC 14-98 (paragraph 80)**

**4004a.** Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481. Name of Attached Document Listing Required Information \_\_\_\_\_

**4004b.** Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband speed and data usage allowances available in the relevant geographic area. Name of Attached Document Listing Required Information \_\_\_\_\_

<b>Certification - Reporting Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<b>&lt;010&gt;</b>	Study Area Code	381614
<b>&lt;015&gt;</b>	Study Area Name	POLAR TELECOMM.
<b>&lt;020&gt;</b>	Program Year	2018
<b>&lt;030&gt;</b>	Contact Name - Person USAC should contact regarding this data	Shari Flanders
<b>&lt;035&gt;</b>	Contact Telephone Number - Number of person identified in data line <030>	7012844343 ext.
<b>&lt;039&gt;</b>	Contact Email Address - Email Address of person identified in data line <030>	sflanders@polartel.com

**TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:**

<b>Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients</b>	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
<small>Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.</small>	

<b>Certification - Agent / Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	381614
<015> Study Area Name	POLAR TELECOMM.
<020> Program Year	2018
<030> Contact Name - Person USAC should contact regarding this data	Shari Flanders
<035> Contact Telephone Number - Number of person identified in data line <030>	7012844343 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	sflanders@polartel.com

**TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:**

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) <u>JSI</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	JSI
Name of Reporting Carrier:	POLAR TELECOMM.
Signature of Authorized Officer:	CERTIFIED ONLINE Date: 06/25/2017
Printed name of Authorized Officer:	Karl Blake
Title or position of Authorized Officer:	CEO
Telephone number of Authorized Officer:	7012847221 ext.
Study Area Code of Reporting Carrier:	381614 Filing Due Date for this form: 07/03/2017
<small>Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.</small>	

**TO BE COMPLETED BY THE AUTHORIZED AGENT:**

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	POLAR TELECOMM.
Name of Authorized Agent Firm:	JSI
Signature of Authorized Agent or Employee of Agent:	CERTIFIED ONLINE Date: 06/25/2017
Name of Authorized Agent Employee:	Cassandra Heyne
Title or position of Authorized Agent or Employee of Agent	Consultant
Telephone number of Authorized Agent or Employee of Agent:	3014597590 ext.
Study Area Code of Reporting Carrier:	381614 Filing Due Date for this form: 07/03/2017
<small>Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.</small>	

**Attachments**

**Polar Communications Mutual Aid Corp.'s Demonstration of Compliance with  
Applicable Service Quality Standards and Consumer Protection Rules**

In establishing this certification in its *2005 ETC Order*,<sup>1</sup> the FCC found that an ETC must make “a specific commitment to objective measures to protect consumers.”<sup>2</sup> The Commission found that for wireless ETCs, compliance with CTIA’s Consumer Code for Wireless Service would satisfy this requirement” and that the sufficiency of other commitments would be considered on a case-by-case basis.<sup>3</sup> In this context, the FCC stated, “to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement.”<sup>4</sup>

**Polar Communications Mutual Aid Corp. f/k/a Polar Telecommunications**

(“Company”) hereby certifies that it is complying with applicable service quality standards and consumer protection rules. The Company is subject to consumer protection obligations under federal law and, to a limited extent under North Dakota state law as a telecommunications carrier subject to North Dakota Public Service Commission regulation. These obligations include, but are not limited to, the following: (1) adherence to state requirements that the Company complies with consumer protection

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<sup>1</sup> *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) (“*2005 ETC Order*”).

<sup>2</sup> *Id.* at para. 28.

<sup>3</sup> *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: “(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy.” *Id.* at n. 71.

<sup>4</sup> *Id.* at n. 72.

and service quality standards pursuant to North Dakota Administrative Code Article 69, including customer requests for lowest price service alternatives (69-09-05-01), discontinuance of telecommunications services (69-09-05-02), deposits and guarantees (69-09-05-03); (2) truth-in-billing requirements, and (3) CPNI, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

The Company also provides service in Minnesota and is subject to consumer protection obligations under Minnesota state law. These obligations include, but are not limited to, the following: (1) filing a Local Exchange Tariff pursuant to the requirements of Minnesota Public Utility Commission which disclose rates, terms and conditions of service to customers; (2) adherence to state consumer protection and service quality requirements governing telephone providers which require compliance with the Minnesota Administrative Rules listed below; (3) truth-in-billing requirements; and (4) CPNI, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

**Minnesota Administrative Rules:**

**RECORDS AND REPORTS**

7810.0400 RETENTION OF RECORDS.  
7810.0500 DATA TO BE FILED WITH THE COMMISSION.  
7810.0600 REPORT TO COMMISSION ON SERVICE DISRUPTION.  
7810.0900 LOCATION OF RECORDS.

**CUSTOMER RELATIONS**

7810.1000 INFORMATION AVAILABLE TO CUSTOMER AND PUBLIC.  
7810.1100 COMPLAINT PROCEDURES.  
7810.1200 RECORD OF COMPLAINT.

**CUSTOMER BILLING; DEPOSIT AND GUARANTEE REQUIREMENTS**

7810.1400 CUSTOMER BILLING.  
7810.1500 DEPOSIT AND GUARANTEE REQUIREMENTS.  
7810.1600 DEPOSIT.  
7810.1700 GUARANTEE OF PAYMENT.

**DISCONNECTION OF SERVICE; SERVICE DELAY**

- 7810.1800 PERMISSIBLE SERVICE DISCONNECTIONS WITH NOTICE.
- 7810.1900 PERMISSIBLE SERVICE DISCONNECTIONS WITHOUT SERVICE.
- 7810.2000 NONPERMISSIBLE REASONS TO DISCONNECT SERVICE.
- 7810.2100 MANNER OF DISCONNECTION.
- 7810.2200 RECONNECTION OF SERVICE.
- 7810.2300 NOTICE REQUIREMENTS.
- 7810.2400 BILL DISPUTES.
- 7810.2500 ESCROW PAYMENTS.
- 7810.2600 WAIVING RIGHT TO DISCONNECT; EMERGENCY STATUS.
- 7810.2800 DELAY IN INITIAL SERVICE OR UPGRADE.

**DIRECTORIES**

- 7810.2900 CONTENT OF DIRECTORIES.
- 7810.3000 MAINTENANCE OF PLANT AND EQUIPMENT.
- 7810.3100 EMERGENCY OPERATIONS.

**ENGINEERING**

- 7810.3200 CONSTRUCTION OF TELEPHONE PLANT.
- 7810.3300 MAINTENANCE OF PLANT AND EQUIPMENT.
- 7810.3900 EMERGENCY OPERATIONS.

**INSPECTIONS, TESTS, SERVICE REQUIREMENTS**

- 7810.4100 ACCESS TO TEST FACILITIES.
- 7810.4300 ACCURACY REQUIREMENTS.
- 7810.4900 ADEQUACY OF SERVICE.
- 7810.5000 UTILITY OBLIGATIONS.
- 7810.5100 TELEPHONE OPERATORS.
- 7810.5200 ANSWERING TIME.
- 7810.5300 DIAL SERVICE REQUIREMENTS.
- 7810.5400 INTEROFFICE TRUNKS.
- 7810.5500 TRANSMISSION REQUIREMENTS.
- 7810.5800 INTERRUPTIONS OF SERVICE.
- 7810.5900 CUSTOMER TROUBLE REPORTS.
- 7810.6000 PROTECTIVE MEASURES.
- 7810.6100 SAFETY PROGRAM.

The Company is subject to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management

practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in F.C.C. 47 C.F.R. Part 8 §8.3. The Company furthermore will comply with all requirements set forth in the *2015 Open Internet Order* when it becomes effective.

## **Polar Communications Mutual Aid Corp.'s Demonstration of Ability to Function in Emergency Situations**

Polar Communications Mutual Aid Corp. f/k/a Polar Telecommunications (“Company”) hereby certifies that it is able to function in emergency situations as set forth in §54.202(a)(2)<sup>1</sup> and North Dakota Administrative Code 69-09-05-12. The Company’s voice and broadband 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). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow the Company 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’s central office can maintain 8 hours, plus or minus 15 percent, of battery reserve rated for peak traffic load requirements, and a permanent auxiliary power unit is installed or a mobile power source is available which can be delivered and connected within four hours. The Company has battery backup at all office locations and in its electronic equipment sites capable of running for a minimum of 8 hours, plus or minus 15

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<sup>1</sup> Section 54.202(a)(2) requires ETCs that are designated by the Commission 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.”

percent. 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 fuel. The Company tests the batteries at least once per year.

The Company also provides service in Minnesota. Pursuant to Minnesota Administrative Rule 7810.3900, "Emergency Operations," the Company has established reasonable provisions to meet emergencies resulting from failures of lighting or power service, sudden and prolonged increases in traffic, illness of operators or from fire, storm, or acts of God including provisions for emergency power that meet or exceed the rule requirement to provide:

- A minimum of four hours of battery service in each central office.
- A permanently installed power unit in exchanges exceeding 5,000 lines.
- Mobile power units that can be delivered on short notice and which can be readily connected in offices without installed emergency power facilities.

The Company has informed employees as to the procedures to be followed, including reasonable rerouting of traffic around damaged facilities and the deployment of emergency power in the event of emergency in order to prevent or mitigate interruption or impairment of telecommunications service. The Company complies with the FCC's backup power requirements, effective October 16, 2015.







**Polar Communications Mutual Aid Corp.'s Telephone Company (SAC 381614)**

**Response to Line 3010 – Milestone Certification (47 CFR §54.313(f)(1)(i))**

Polar Communications Mutual Aid Corp. f/k/a Polar Telecommunications hereby certifies that throughout 2016, it took reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas and that requests for such service are met within a reasonable amount of time. If a request for broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream is unreasonable, the Company offers broadband service at the highest available speed.