

**STATE OF NORTH DAKOTA  
BEFORE THE PUBLIC SERVICE COMMISSION**

APPLICATION OF JAMES VALLEY  
COOPERATIVE TELEPHONE COMPANY  
TO PROTECT TRADE SECRET AND  
CONFIDENTIAL INFORMATION IN 2017  
FORM 481 ETC REPORT

CASE NO.



James Valley Cooperative Telephone Company ("JVT") hereby moves the North Dakota Public Service Commission (the "Commission") for an Order, under Chapter 69-02-09 and Section 69-02-09-04 of the North Dakota Administrative Code, granting Trade-Secret Protection to the following documents:

- Exhibit A – 2016 Federal Universal Service Receipts; and**
- Exhibit B – Company's Form 481,**

filed in compliance with North Dakota Administrative Code Section 69-09-05-12(3) and Section 69-09-05-12.1, in support of its 2017 Annual Report for Essential Telecommunications Carrier ("ETC") Certification.

1. Description. The information which JVT has designated as Confidential is contained in a separate envelope, marked "TRADE SECRET – PRIVATE."

In general, the information so designated consists of:

- a. A description of Service Improvement Plans;
- b. A summary of the Expenditures in the prior calendar year;
- c. An estimate of the Universal Service Support to be received in the upcoming calendar year and the planned capital expenditures;
- d. A description of improvements and upgrades; and
- e. An outage report.

2. The information so designated by JVT derives independent economic value, actual or potential, from not being generally known to other persons because the information

is maintained as proprietary information and is not shared with the public or competitors, except in a more general sense. The level of detail involved would easily allow competitors to determine the level of support and the cost of service to study areas and exchanges in JVT's service areas.

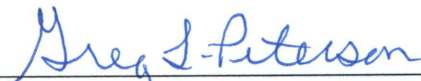
3. The information is not readily ascertainable by proper means by other persons, because it contains a description of matters which is only reviewed and known by the highest management level personnel, and includes descriptions of capital spending plans and improvements in detail not available to those outside the management group.

4. A general description of those persons or entities that could obtain economic value from the disclosure or use of the information are competitor or potential competitors which include wireless providers, cable television providers, competitive local exchange carriers, internet providers, dish networks, and other local exchange carriers.

5. A description of the efforts used to maintain the secrecy of the information includes assuring that access to the information is restricted to the employees and management-level persons who have a need to know the information and, it is not disclosed to persons outside the company, except under strict circumstances.

Dated: July 24, 2017.

BANTZ, GOSCH & CREMER, L.L.C.



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**STATE OF NORTH DAKOTA**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

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APPLICATION OF JAMES VALLEY  
COOPERATIVE TELEPHONE COMPANY  
TO PROTECT TRADE SECRET AND  
CONFIDENTIAL INFORMATION IN 2016  
FORM 481 ETC REPORT

CASE NO. \_\_\_\_\_  
**Affidavit of James Valley  
Cooperative Telephone Company  
Regarding Certification of Use  
of Federal Universal Service Support**

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STATE OF SOUTH DAKOTA  
SS  
COUNTY OF BROWN

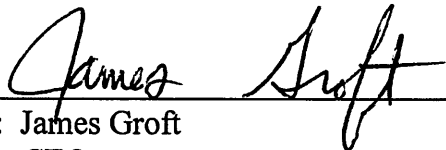
James Groft, being first duly sworn on oath, does hereby declare and state upon affiant's own personal knowledge as follows:

1. I am employed by James Valley Cooperative Telephone Company (hereinafter, the "Cooperative"), in the position of CEO.
2. The Cooperative is an eligible telecommunications carrier within the meaning of Section 214(e) of the Federal Telecommunications Act of 1996 (hereinafter, the "Act"), and the Cooperative is eligible to receive federal high-cost universal service support (hereinafter, the "Support") pursuant to Section 254(e) of the Act. The North Dakota Public Service Commission (hereinafter, the "NDPSC") has designated the Cooperative as an eligible telecommunications carrier.
3. I am personally familiar with all of the Support received by the Cooperative, and with how the Cooperative uses all Support it receives.
4. The Cooperative is filing this affidavit in compliance with the order of the Federal Communications Commission ("FCC") dated May 23, 2001, in WC Docket Number 10-90 and WC Docket Number 14-58 (FCC 01-157) (the "Order"), as codified in 47 C.F.R. § 54.314, which requires certification to the FCC that all federal Support was used in the preceding calendar year, and will be used in the coming calendar year, by carriers within each state only for the provision, maintenance and upgrading of facilities and services for which the support is intended, as required by Section 254(e) of the Act and 47 C.F.R. § 54.7. The Cooperative is also filing this affidavit in compliance with the Orders of the NDPSC dated August 28, 2001, in Case No. PU-439-01-460 and dated August 28, 2002, in Case No. PU-439-02-441. This affidavit is filed to facilitate the Cooperative's receipt of federal Support for all four quarters of 2016, and for all quarters thereafter.

5. The Cooperative hereby certifies that all federal high-cost support provided to James Valley Cooperative Telephone Company was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance, and upgrading of facilities and services for which the support is intended pursuant to and consistent with Section 254(e) of the Act and 47 C.F.R. § 54.7. The Cooperative will use the Support for the following services, as designated in 47 C.F.R. Section 54.101, through the Cooperative's study area: (a) voice grade access to the public switched network or its functional equivalent; (b) minutes of use for local service at no additional charge; (c) access to emergency services; and (d) toll limitation services to qualifying low-income consumers.

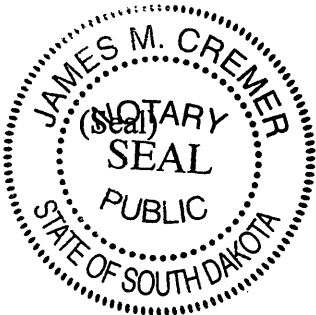
Dated this 24th day of July, 2017.

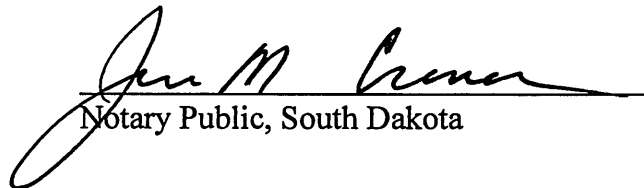
**JAMES VALLEY COOPERATIVE  
TELEPHONE COMPANY**

  
By: James Groft  
Its: CEO

STATE OF SOUTH DAKOTA  
SS  
COUNTY OF BROWN

On this 24th day of July, 2017, before me, a Notary Public in and for said County and State, personally appeared **James Groft**, known to me to be the CEO of **James Valley Cooperative Telephone Company**, the cooperative that is described in and that executed the within instrument, and acknowledged to me that such cooperative executed the same.



  
Notary Public, South Dakota

My Commission Expires: 1-27-2021