### BLACKBURN & STOLL, LC

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August 15, 2012

## **Hand Delivered**

Chris Parker William Duncan Heber M. Wells Building 160 East 300 South, 4th Floor Salt Lake City, Utah 84111

> Docket No. 12-999-07. In the Matter of State Certification of Rural Carriers' Re:

Compliance with 47 U.S.C. Section 254(e)

Dear Mr. Parker and Mr. Duncan:

Please find enclosed Certification documentation and letter signed by Bruce Todd on behalf of Strata Networks (UBTA-UBET Communications, Inc.) that is required by Docket No. 12-999-07. Please note that the Certification Letter is addressed to Gary Widerburg at the Public Service Commission, however, pursuant to the Notice issued in Docket No. 12-999-07, the information is supposed to be sent to you. If you believe we are required, or you would like me, to provide the information to the Public Service Commission, please let me know at once.

Please note that this information (with the exception of the Certification Letter) was provided to the Public Service Commission on June 29, 2012. If you have any questions concerning the above, please feel free to contact me at your convenience.

Very truly yours,

BLACKBURN & STOLL, LC

Vii Un Sun

Kira M. Slawson

Enclosures



August 14, 2012

Mr. Gary L. Widerburg Commission Secretary Utah Public Service Commission Heber M. Wells Building, 4th Floor 160 East 300 South Salt Lake City, Utah 84145

Re: Docket No. 12-999-07. In the Matter of State Certification of Rural Carriers' Compliance with 47 U.S.C. Section 254(e)

Dear Mr. Widerburg:

Under the Transformation Order, the State PSC is required to conduct a review of the information and certify to the FCC on or before October 1, 2012, that each company has, in the previous fiscal year, and will in the future fiscal year, use the USF funds for the required purposes. As a state designated eligible telecommunications carrier that receives High Cost Loop Support, pursuant to the Federal Communications Commission ("FCC") USF ICC Transformation Order (FCC 11-161) and 47 CFR 54.313 and 47 CFR 54.304 of the FCC Rules, we were required to file certain documents with the FCC and USAC. NECA submitted this data to the FCC and USAC on our behalf. We are providing the same information to you that was provided to the FCC and USAC for your review.

1. 2012 Annual Reporting Requirements and Certifications that were filed with the FCC (47 CFR 54.313);

 CAF ICC Data for establishing your company's projected eligibility for Intercarrier Compensation Replacement (47 CFR 54.304);

3. Local Rate Floor Data that has been submitted to the FCC and USAC (47 CFR 54.313(h).

Accordingly, UBTA-UBET Communications, INC dba STRATA Networks, (NECA company number 502287), is a rural telephone company that has previously been designated by this Commission as an eligible telecommunications carrier. The Company is complying with the requirements of Section 254(e) and will continue to comply for the period January 1, 2013, through December 31, 2013, (the certification period) to be eligible to receive federal USF. The company certifies to the Commission that it will use all federal high-cost support provided to it only for the provision, maintenance and upgrading of facilities and services for which the support is intended, consistent with the principles of universal service 47 U.S.C. 254. This includes, but is not limited to, trying to meet the goal of the provision of services that are properly supported by the high-cost funds at rates that are reasonably comparable to rates charged for similar services in urban areas.

This is a very critical issue, because if certification is not accomplished by October 1, 2012, then federal support for universal service in the areas served by the rural carriers within Utah will not be provided for at least the first quarter of 2013. Accordingly, replacement revenues would become necessary. Any loss of federal support would be a negative outcome for the Rural Companies, their customers and the Commission.

In view of the limited time available, we request the Commission issue a certification before October 1, 2012, to USAC and the FCC that our company is eligible to receive Federal USF and is in compliance with the FCC order.

Very truly yours,

Bruce H. Todd CEO/General Manager

cc: Paul Anderson, Division of Public Utilities Ray Hendershot, GVNW Consulting, Inc. June 28, 2012

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

Ms. Karen Majcher Vice President – High Cost Low Income Division Universal Service Administrative Company 2000 L Street NW, Suite 200 Washington, D.C. 20036

RE: WC Docket No. 10-90: Annual Reporting Requirements for High-Cost Recipients §54.313

Pursuant to Section 54.313 of the Federal Communications Commission's rules, enclosed are the 2012 annual reporting requirements and certifications for UBTA-UBET Communications, Inc.; dba Strata Networks, Study Area Code 502287. Strata Networks is a state-designated ETC, and as such, is submitting to the Commission relevant information from reports it files with its state commission.

Should you have any questions, please contact me via email at btodd@stratanetworks.com or by phone at 435-622-5242.

Sincerely,

Bruce H. Todd Chief Executive Officer

Enclosures

Cc: Utah Public Utilities Commission

# Annual Reporting Requirements pursuant to § 54.313(a)(2)-(6)

WC.	Do	ckat	t No.	10	_գր
446		LINE	LINU.		-30

§ 54.313	(a)(2) - Outage reporting
X	My company was not required to collect this information in 2011.
	My company collected this information pursuant to state utility commission requirement. A copy of the report is attached.
§ 54.313	a)(a)(3) – Unfulfilled service requests
<u>X</u>	My company was not required to collect this information in 2011.
<del></del>	My company collected this information pursuant to state utility commission requirement. A copy of the report is attached.
§ 54.313	3(a)(4) – Customer complaints per 1000 connections
<u>X</u>	My company was not required to collect this information in 2011.
	My company collected this information pursuant to state utility commission requirement. A copy of the report is attached.
§ 54.313	B(a)(5) – Service quality standards and consumer protection rules
	tify that the reporting carrier is in compliance with applicable service quality standards and umer protection rules.
§ 54.310	B(a)(6) – Ability to function in emergency situations
l cen	tify that the reporting carrier can function in emergency situations as set forth in 47 CFR

I certify that the reporting carrier can function in emergency situations as set forth in 47 CFR §54.202(a)(2). Specifically, the reporting carrier 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.

I am authorized to make this certification on behalf of the company named above and, to the best of my knowledge the information reported on this form is accurate. This certification is for the study area(s) listed below. (Please enter your Company Name, State and Study Area Code)

Company Name	State	Study Area Code
UBTA-UBET Communications, Inc.	Utah	502287

(If necessary, attach a separate list of additional study areas and check this box.)

Signed,

(Signature of Corporate Officer

Bruce H. Todd

[Printed Name of Corporate Officer]

CEO

[Title of Corporate Officer]

Carrier's Name UBtA-UBET Communications, Inc. Carrier's Address PO Box 398, Roosevelt, Utah 84066 Carrier's Telephone Number (435) 622-5007

Date:

June 28, 2012

#### Rate Floor Template

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING RATE FLOOR DATA ON ITS OWN BEHALF:

	National Control of the Control of t	
Certification of Officer as to the Accuracy of the Data Reported	for the Rate Flo	por Data
I certify that I am an officer or employee of the reporting carrier; my responsibilities include floor data reported; and, to the best of my knowledge, the information reported on this form	is accurate.	rracy of the actual rate
Name of Reporting Carrier UBTA-UBET COMMUNICATIONS, INC. (dba Strata Net	works)	
Signature of authorized officer or employee KAN SIUNE		Date 06-04-2012
Printed name of authorized officer or employee Karl Searle		
Title or position of authorized officer or employee Chief Financial Officer		
Telaphone number of authorized officer or employee: (435), 622-5472, ext.		
Study Area Code of Reporting Carrier 502287 Filing Due Date for this form (mm/dd/yyyy)	7/1/2012	



### 2012 CAF ICC Data Collection

NECA Home NECA Data Collections Contact Us General Instructions Logout Logged in User: Karl Searle

Home Select Company Main Page Support Election Study Area Data Input + CAF & ARC Output + Electronic Certifications

Study Area: UBTA-UBET/STRATA (ID: 502287)

Study Area - Exchange Level Data for Residential ARC

[ 🗟 Upload Residential Lines & Rates]

[ Download NECA template]

Residential Lines & Rates Input Residential Lines & Rates Summary

Residential Lines and Local Rates Data

Average Number of Lines for Test Period 2012/2013 (July 1, 2012 - June 30, 2013) Local Rates as of January 2012

[	Exchange/Zone	Residential	Life	Current	Additional					County E-		TRS &	
Study	Name	Access		Residential	•		Subscriber		Surcharge		911	other	Dele
Area	i .	Lines		Flat Rate	Local	Calling	Line Charge	Line Charge		Surcharge	(e.g. nre &	hearing impaired	Exchai
ID	1	]			Rate Charges		Charge	Cliarge		ŀ		Surcharges	
502287			0	0,00	0,00	0,00	0.00	0.00	0.00	0.00	0.00	0.00	<b>a</b>
502287		665	34	<u> </u>	0,00	5.75	6.50	0,00	0.22	0.00	0,69	0.07	<u>a</u>
502287		503	48	16,50	0.00	3.25	6.50	0.00	0.20	0.00	0.69	0.07	1
502287	<u> </u>	302	38	16,50	0.00	5.75	6,50	0.00	0.22	0.00	0.69	0.07	8
502287	<u> </u>	243	47	16,50	0.00	5.75	6.50	0.00	0.22	0.00	0.69	0.07	13
502287		332	25	16,50	0.00	5,75	6,50	0.00	0.22	0,00	0.69	0.07	1
50228	Recia	541	70	16,50	0.00	5,75	6.50	0.00	0,22	0.00	0.69	0.07	1
502287	Randlett	157	33	16,50	0.00	5,75	6.50	0.00	0.22	0.00	0.69	0.07	<u> </u>
50228	Roosevalt	2632	339	16.50	0,00	2.25	6.50	0.00	0.19	0.00	0.69	0.07	ਿੱਚ
50228	Tabiona	234	36	16.50	0,00	5.75	6.50	0.00	0.22	0.00	0.69	0.07	छि
50228	7 Vernal	5644	381	16.50	0,00	1.80	6,50	0.00	0.18	0.00	0.69	0.07	1 1

Submit Respons-

[Records response entered/updated on the above the



### 2012 CAF ICC Data Collection

NECA Home NECA Data Collections Contact Us General Instructions Logout

Logged in User: Karl Searle



Home Select Company Main Page Support Election Study Area Data Input > CAF & ARC Output > Electronic Certifications

Study Area: UBTA-UBET/STRATA (ID: 502287)

Study Area - Exchange Level Data for Residential ARC

( Upload Residential Lines & Rates)

[ Download NECA template]

Residential Lines & Rates Input Residential Lines & Rates Summary

Residential Lines and Local Rates Data - Output

Average Number of Lines for Test Period 2012/2013 (July 1, 2012 - June 30, 2013) Local Rates as of January 2012

Refresh Data

Study Area ID	Exchange/Zone Name	Residential Access Lines	Life Lines	Residential Lines excluding Life Lines	Total Residential Charges	Amount (above)/below \$30,00 Rate Ceiling
502287	Altamont	665	34	631	\$ 29.73	\$ 0.27
	Duchesne	503	48	455	\$ 27.21	\$ 2.79
•		302	38	264	\$ 29.73	\$ 0.2
	Flat Top	243	47	196	\$ 29.73	\$ 0.27
•	Fruitiand	332	25	307	\$ 29.73	\$ 0.2
502287	LaPoint	541	70	1.21	\$ 29.73	\$ 0.2
502287	Neola		33			\$ 0.2
502287	Randlett	157			i ' ' ' '	\$ 3.8
502287	Roosevelt	2632	339		l ,	\$ 0,2
502287	Tabiona	234	36	1		•
502287	Vernal	5644	381	5263	\$ 25.74	\$ 4.2

# DATA COLLECTION FORM at the STUDY AREA LEVEL RATE OF RETURN CARRIER ELIGIBLE RECOVERY CONNECT AMERICA FUND

(20) Program Year: July 1, 2012 through June 30, 2013 (40) Contact Name: Person USAC should contact with question about this data: Karl Searle (45) Contact Telephone Number: 435-622-5472 Ext. (45) Contact Telephone Number: d35-622-5472 Ext.

Submission Type (Check one): Original Projection

E1 017(A)(1)(B)	(11)(1)(2)(1)(2)	000 avec		(020)		の 1 日本の 1	t Election 2011 Interstate Switched Access Revenue	Positification		\$1022768.42	
	HUIS			(015)		AS THE PROPERTY OF THE PROPERT	Study Area Name CAF ICC Support			Y Y A VALOUE OF THE STATE OF TH	
				(010)				Name Holding Company ID Study Area ID			N/A
								Folding Company Name	ij	The second of th	N/A

calc		R REVENUE REQUIREMENT		(4)=(1)+(2)+(3)	2011 ROR Carrier Base Period Revenue	]
51.917(c)(1)(iii)	para 892	RATE-OF-RETURN (ROR) CARRIER REVENUE REQUIREMEN	(058)	(3)	FY 2011 Net Reciprocal Compensation	Revenue \$368468:00
E4 047(A)(1)	01:317(U)(1)(I)	The part of the pa	(054)	(2)	FY 2011 Intrastate Terminating Switched	Access Revenues \$ 505464

51.917(d)(1)(j)(2)	para 898	(070)	(7)	Interstate Switched Access Revenues
calc	para 892		(6)=(4)*(5)	ROR Carrier Revenue Requirement \$ 1801865.00
51.917(b)(2)	para 894	(090)	(5)	ROR Carrier Baseline Adjustment Factor

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calc	THE RESERVE THE PROPERTY OF TH	ないできるというできないというできません。これできないというできます。		(11)=(7)+(8)+(9) (12)	2) Total ICC Revenue TRS Increment
51.917(d)(1)(ii)(4)	A CONTRACTOR OF THE PROPERTY O	consideration for the contract of the contract	(078)		eserved for future use
51.917(d)(1)(i)(3)		fercarrier compensation (GCC) Rates		(6)	Net Transitional Reciprocal Compensation (Re Revenues
51.917(d)(1)(i)(1)	para 898	REVENUES FROM REFORMED INTE	(074)	(8)	Transitional Intrastate Access Service Revenues \$ 253402.00

	Eligible Recovery	(31)		Increment State Terminating Access Support revenue Interstate Local Switching Support for Fine to be received	00:00\$
	 		(CT)	State Terminating Access Support revenue to be received	
			(14)	NANPA Increment	
			(13)	Regulatory-Fees Increment	

.

Cico		REVENUES EROM ACCESS	(19) Residential ARC Annual Revenues Single-Line Business ARC Annual Revenues \$55,164.00
	calc		(18) Residential ARC Annual Revenues Si \$55,164.00
	ciac		(17)=[(6)-(11)]+(12)+(13)+(14)-(15)-(16) Eligible Recovery \$ 1022157:00

51.917(f)(2)				ICC-REPLACEMENT CONNECT AMERICA	FUND (CAF) SUP	00.27.T.5.00
calc	para 899		(21)=(18)+(19)+(20)	ial Revenues TOTAL ARC ANNUAL REVENUES		\$119,982,00
caic		RECOVERY CHARGES	(20)	Multi-Line Business ARC Annual Revenues		00:89T/£9\$

# CONNECT AMERICA FUND RATE OF RETURN CARRIER ELIGIBLE RECOVERY DATA COLLECTION FORM at the EXCHANGE LEVEL

		<u> </u>		
·				
Holding Company Name	Holding Company ID	Study Area ID	Exchange Name	Zone Name
Control of the Contro		502287	Altamont	
	olika Lareva eta eta iliakia	502287	Duchesne	
		502287	Flat Top	
TOTAL TOTAL SOME PERFECT OF THE SOME SOME SOME	Dayson Silver State Silver Silver	502287	Fruitland	
		502287	LaPoint	
		502287	Neola	
		502287	Randlett	
notice of exercise water and the second	N. S. W. S. S. S. S. C. 7548 (2)	502287	Roosevelt	AVITS SELECT
		502287	Tablona	
		502287	Vernal	
an en	**************************************	502287	Summary	

Rule	51.917(e)(6)(i)	calc
Order		
	A CAMP AND TO SELECT	
(080)	(081)	
(1)	(2)	(3)=(1)*(2)*12
Residential Lines excluding Lifelines	Residential ARC Charge	Residential ARC Revenue
631	\$0.27	\$2,044.00
455	\$0.50	\$2,730,00
264	\$0.27	\$855.00
196	\$0.27	\$635.00
307	\$0.27	\$994.00
471	\$0.27	\$1,526.00
124	\$0.27	\$401.00
2293	\$0.50	\$13,758.00
198	\$0.27	\$641.00
5263	\$0.50	\$31,578.00
10202		\$55,162.00

	51.917(e)(6)(i)	calc	
REVENUES FROM ACCESS	RECOVERY CHA	(RGES)	
(082)	(083)		(084)
(4)	(5)	(6)=(4)*(5)*12	(7)
Single-Line Business (SLB) Lines	SLB ARC	SLB ARC Revenue	Multi-Line Business (SLB) Lines
275			5264
275	<b>设定的3.5000000</b>		5264
275			5264
275			5264 5264
275			5264 5264
275			5264
275			5264
275			5264
275 275		**************************************	5264
275		\$1,650.00	

51.917(e)(6)(ii)	calc	calc
		para 899
(085)		
(8)	(9)=(7)*(8)*12	(10)=(3)+(6)+(9)
MILB ARC	MLB ARC Revenue	Total ARC Revenue
	470.4 (Feb. 3.4 (1.4 (1.4 (1.4 (1.4 (1.4 (1.4 (1.4 (1	
<b>计行为企业的模块</b>	tigas de la la desarta	Walling of the same of the same
		- 的特殊技術學學學
\$1.00	\$63,168.00	\$119,980.00

# TO BE COMPLETED BY THE REPORTING CARRIER.

Cert	ification of Office	er as to the A	Accuracy of the CAF ICC Data Re	eported		
I certify that I am an officer of the reporting card best of my knowledge, the information reported	rier; my responsibi I on this form is ac	ilities include ccurate.	ensuring the accuracy of the actual	data reported; and, to the		
	BET/STRATA		Digitally signed by Karl Se Seade email≂kseade@str	earle DN:cn=Kari atanetworks com O=ubta-ubet/s		
Kari S Signature of Authorized Officer:	Karl Searle Signature of Authorized Officer:			Searie,email-ksearie@stratanetworks.com,O=ubta-ubet/s trata,I=Roosevelt UT 84068, Date:5/23/2012		
Printed name of Authorized Officer:	Karl Searle	<u>.                                    </u>				
Title or position of Authorized Officer:	CFO					
Telephone number of Authorized Officer:	435-622-5472	2				
Study Area Code of Reporting Carrier	502287		Filing Due Date for this form (mm/dd/yyyy)	6/18/2012		
Persons willfully making false sta §§ 502, 503	tements on this for (b), or fine or impri	rm can be pur sonment und	nished by fine or forfeiture under the er Title 18 of the United States Code	Communications Act of 19 , 18 U.S.C. § 1001.	934, 47 U.S.C.	

### TO BE COMPLETED BY AN OFFICER OF THE REPORTING CARRIER

. <u> </u>			,			
Certificati	on of Officer fo	r Rate-of-Ret	turn Carrier Eligibility for CAF/ICC	Recovery		
I certify that I am an officer of the reporting carrinas complied with Eligible Recovery §51.917(d) a requested pursuant to §51.917(f).	er and that, to the	e best of my k overy Charge §	nowledge, the reporting carrier on thi 51.917(e) and is eligible to receive the	s form certifies that it e CAF ICC support		
Name of Reporting Carrier: UBTA-UB	ET/STRATA					<u> </u>
Digitally signed by Karl Searle DN:cn=Karl  Karl Searle Searle,emait=ksearle@stratanetworks.com,0=ubta-ubet/str  ata,1=Roosevelt UT 84066, Date:5/23/2012						5/23/201
Signature of Authorized Officer or employee:						
Printed name of Authorized Officer or employe	ee:	Karl Searle				
Title or position of Authorized Officer or emplo	yee:	CFO				
Telephone number of Authorized Officer or en	nployee:	435-622-54	72			Simple come transport (1982)
Study Area Code of Reporting Carrier	502287		Filing Due Date for this form (mm/dd/yyyy)	6/18/2012		

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.

# TO BE COMPLETED BY AN OFFICER OF THE REPORTING CARRIER

Certificatio	n of Officer for	Rate-of-Retu	urn Carrier Not Seeking Duplicat	ve Recovery		
i certify that I am an officer of the reporting carri recovery in the state jurisdiction for any Eligible	er and that, to the Recovery subjec	e best of my k ct to the recov	nowledge, the reporting carrier is no ery mechanism as per §51.917(d){vii	t seeking duplicative I.		
Name of Reporting Carrier: UBTA-UB	ET/STRATA Karl Searle	e	Digitally signed by Karl Searle Searle,emait-ksearle@stratan	etworks.com,O=ubta-ubeVstr		
Adil Searie  ata,i=Roosevelt UT 84066, Date:5/23/2012  Signature of Authorized Officer or employee:						5/23/20
Printed name of Authorized Officer or employe	ee:	Karl Searle				
Title or position of Authorized Officer or emplo	yee:	CFO				
Telephone number of Authorized Officer or er	nployee:	435-622-54	472			
Study Area Code of Reporting Carrier	502287		Filing Due Date for this form (mm/dd/yyyy)	6/18/2012		
Persons willfully making false state §§ 502, 503(b	ments on this fo ), or fine or impri	rm can be pur isonment und	nished by fine or forfeiture under the er Title 18 of the United States Code,	Communications Act of 19 18 U.S.C. § 1001.	34, 47 U.S.C.	