

Operating Procedures Applicable to Basic Universal Service (BUS) Offering for Union Telephone Company, d/b/a Union Wireless (Union) or its Subsidiary

A. ACCESS TO RECORDS.

All records required by these procedures pertaining to Union's Basic Universal Service (BUS) offering shall be made available to the Commission or its authorized representatives at any time upon request. Union shall place its BUS offering on its website in plain sight of potential customers.

B. RETENTION OF RECORDS.

Unless otherwise authorized by the Colorado Public Utilities Commission (Commission), all records required by these procedures pertaining to Union's BUS offering shall be preserved for the period of time specified by FCC 47 CFR §54.320 or by Rule 4 CCR 723-2-2005 of the Rules Regulating Telecommunications Providers, Services, and Products, but in no event less than a minimum of 24 months after the date of entry of the record or for any longer period of time specified by FCC rule or order or Commission rule, whichever is longer.

C. SERVICE AREA MAPS.

Attachment A to Stipulation depicts the exchanges where Union is designated ETC status.

D. RECORDS OF COMPLAINTS

1. Union shall maintain an accurate record of all oral and written complaints made by its customers regarding its service, or rates and charges. This record shall include the name and address of the customer or complainant, the time, date and nature of the complaint, the action taken to clear trouble, and the date and time of trouble clearance.
2. The record of complaints shall be categorized to indicate to Union and to the Commission whether any particular customer encounters the same difficulties frequently, in terms of complaints per month, including customer trouble reports, whether a large number or percentage of all complaints from different customers arise from the same irregularity in service, with 5 percent or more of all complaints over a three month period being considered significant, or whether some phase of the construction, equipment, maintenance or operation are causing the complaints.
3. For any unresolved complaints or customer questions, Union shall direct its personnel engaged in initial contact with an applicant or Customer in which dissatisfaction with the decision or explanation by the personnel is expressed, to inform the Customer of the right to have the problem

considered and acted upon by another consumer representative or supervisory personnel of Union. If the applicant or Customer continues to express dissatisfaction after the supervisory personnel have addressed the problem, Union shall further direct the supervisory personnel to provide the complainant that they may contact the External Affairs Section of the Commission at Colorado Public Utilities Commission, Consumer Affairs, 1560 Broadway, Suite 250, Denver Colorado 80202, Phone 303-894-2070 or 800-456-0858, fax number 303-894-2532 or by e-mail to PUCconsumer.complaints@dora.state.co.us for further review of an unresolved problem.

F. HELD SERVICE APPLICATIONS

1. During periods of time, if any, when Union may not be able to supply service to customers whose Lifeline applications have been completed and approved in Union's service areas within the time frames established in these procedures, Union shall keep a record for each service area showing the name and address of each applicant for service, the date of application, the class type and grade of service applied for, (*e.g.*, first line or additional line), together with the reason for the delay in providing the service to the applicant, and the expected date of service.
2. If the number of held service orders exceeds 50 orders in a service area providing service to 2,000 or more customers, or 20 held service orders in a service area serving fewer than 2,000 customers, Union shall maintain a summary of applications for each affected service area showing the total number categorized by various causes for delay and by dates of application.
3. If conditions described in paragraph G.1 occur, Union shall submit to the Commission a report showing the information required by paragraph 1 of this procedure, and the number of days service has been delayed, when the lesser of 50 or 5 percent of the total number of service applications in a service area in a consecutive three-month period are held service orders. Union shall further submit a report of its proposed action to reduce the number of those held service orders to fewer than the lesser of 50 or five percent of the total number of service applications in that service area. Reports must be submitted to the Commission by April 1st of each year.
4. Under circumstances where the period to provide BUS service exceed 30 calendar days, Union shall file a letter with the Commission stating the circumstances causing the delay, explaining whether such circumstances are beyond Union's control, and providing an estimate of the time necessary to provide service.

G. SERVICE INTERRUPTIONS

General

1. Service is interrupted when it becomes unusable to the Customer or when the Customer is unable to transmit or receive calls due to the failure of a component of the network furnished by Union.
2. An interruption period begins when the Customer reports a service, facility or circuit to be inoperative and releases it for testing and repair. An interruption period ends when the service, facility or circuit is operative.

Reestablishing Service

1. Company will make all reasonable efforts to prevent interruptions of service and, when interruptions do occur, reestablish service with the shortest possible delay. Company will make attempts to resolve emergencies at all hours, consistent with the bona fide needs of customers and the personal safety of Company's employees. In almost all cases, Company will be able to reestablish service within 24 hours. If unusual repairs are required, or other factors will prevent the prompt reestablishment of service, Union will make reasonable efforts to contact Customer.

Record Keeping and Reports

1. Union shall keep a record showing all interruptions affecting service in an entire service area or any major portion of it that affects the lesser of 25 percent or 1,000 of the service area's customers for one or more hours during the day. This record shall show the date, time, duration, extent and cause of the interruption. Union shall inform Customers of the potential of future service unavailability when Union is experiencing or is forecasting potential service unavailability in specific areas for purposes other than outages due to routine maintenance. Services are available twenty-four (24) hours per day, seven (7) days per week. Union will make reasonable arrangements to resolve emergencies resulting from failures of service, unusual and prolonged increases in traffic, illness of personnel, fire, storm or other acts of God, and inform its employees as to procedures to be followed in the event of such emergencies in order to prevent or minimize interruptions or impairment of telecommunications service. Reports must be submitted to the Commission by April 1st of each year.

H. ADVERTISING

Union shall submit annual reports describing advertising materials it uses in Colorado to the Commission Staff and OCC no later than April 1st of each year.

I. NETWORK REQUIREMENTS

Intra-LATA Interexchange Toll Dialing Pattern. Union will comply with all NANP dialing pattern requirements.

J. REPORTING REQUIREMENTS

Union shall file the following reports with the Commission:

1. Copies of all filings submitted to Federal Communications Commission (FCC) or Universal Service Administrator Company (USAC). Union shall file copies of all FCC forms submitted to the FCC or USAC, including Form 497, with the Commission at the time filings occur at the FCC or USAC.
2. Annual ETC Certification. Union will file annual certification that it is able to function in emergency situations, is complying with applicable service quality standards and the consumer protection rules, e.g., the CTIA consumer code for wireless service. This certification shall be filed with the Commission by April 1st of each year.
3. Plan Offerings. Union shall file a copy with the Commission in advance of any and all proposed offering(s) 30 days prior to offering service to customers in Colorado.
4. Changes to existing plans or new plans. Union shall notify the Commission 30 days in advance before implementing any changes to terms, conditions, to the BUS plan and any changes to any new plans or products introduced.
5. Submit quarterly report to Commission regarding Lifeline customer-specific data. Union shall submit a quarterly report to the Commission to include customer-specific data: customer name, address, and zip code for:
 - a. Lifeline customers receiving or that have applied through Union for a second Lifeline subsidy per household in that same month from Union,
 - b. Lifeline customers receiving or that have applied through Union for a second Lifeline subsidy per household in that same month from another carrier,
 - c. New Lifeline customers enrolled in Union's Lifeline service,
 - d. Lifeline customers removed from Lifeline service due to non-usage, and
 - e. Lifeline customers removed from Lifeline service due to ineligibility through the verification process.
6. Unfilled Requests for Service. Number of requests for service from eligible Lifeline customers approved by DHS within Union's service area which were unfulfilled during the past year. Report must be submitted to Commission by April 1st of each year.

K. CTIA CODE OF CONDUCT

1. Union shall comply with the principles, disclosures, and practices for wireless service provided to consumers in the Cellular Telecommunications and Internet Association's (CTIA) Consumer Code for Wireless Service. Such Code can be found at: http://files.ctia.org/pdf/The_Code.pdf.

L. SUBSCRIBER ELIGIBILITY FOR LIFELINE

1. Subscriber eligibility shall be established pursuant to a DHS certification process and as modified by the Colorado General Assembly. Upon initial application for Union's Lifeline service, the Customer must certify by his or her signature under penalty of perjury that he or she is head of household and that he or she will receive Lifeline supported services only from Union.
 - a Union shall require each eligible Lifeline consumer to self-certify under penalty of perjury at the time of enrollment and annually thereafter that his or her household will receive only one Lifeline service and, to the best of his or her knowledge, the subscriber's household is not already receiving a Lifeline service;
 - b Union shall require each eligible Lifeline consumer at the time of application to initial on the certification form that to the best of his or her knowledge that he or she is not receiving Lifeline-supported service from any other Lifeline provider and to ensure the consumer understands that "Lifeline-supported service" is a federal subsidy.
2. Union shall file a copy of state-specific subscriber data, including name and address of Lifeline subscribers, to the Universal Service Administrative Company (USAC), upon request, and to this Commission for the purpose of determining whether an existing Lifeline subscriber receives Lifeline service from another carrier.
3. Union shall immediately investigate any notification from the Commission, DHS, or USAC regarding any Lifeline customer receiving duplicate subsidy from another carrier or from Union. If it is determined that the Lifeline customer is receiving duplicate subsidy, Union will work with the other carrier(s) to notify the customer of the duplicate accounts and work with the customer to choose only one provider of Lifeline service. Union shall also abide by any rules of the FCC and work with USAC and the Commission Staff to rectify any duplicate accounts. In the event the customer selects a carrier other than Union to provide Lifeline service, Union shall promptly remove the customer's Lifeline service and remove customer from any USAC reimbursement.

4. Union shall deal directly with the subscriber and DHS to certify and verify the subscriber's Lifeline eligibility on an annual basis.
5. Union shall explain in prominent, plain, easily comprehensible language to all new and potential subscribers that no consumer is permitted to receive more than one Lifeline subsidy.
6. Union shall ensure that all marketing materials for the service make clear that it is a Lifeline-supported service.
7. Union shall promptly, de-enroll any subscriber whom Union determines is no longer eligible for Lifeline service or is notified by DHS that the subscriber is no longer eligible for Lifeline service. Union shall promptly remove a customer's Lifeline service and remove customer from any USAC reimbursement.

M. 911 CALLING

1. Union shall provide access to 911 service. If service is disconnected or minutes are depleted, customers may still make 911 calls and calls to Customer Care number.
2. Union shall pay the appropriate wireless E911 charges in accordance with C.R.S. § 29-11-102 and 29-11-102.5.

O. CUSTOMER CARE ACCESS

1. Customers will be provided a toll-free method to access Union's customer care representatives who are continuously available by dialing 611 from a Union handset, and online at www.unionwireless.com. Customers may obtain directory assistance by dialing 411 from a Union handset.

P. Limitations of Liability

1. Because Union has no control of the content of communications transmitted over its network, and because of the possibility of errors incident to the provision and use of its services, services furnished by Union are subject to the terms, conditions and limitations specified herein and in Union's Terms of Service available on the www.unionwireless.com website.

Q. Customer Disconnection

1. Union may not deny or discontinue service to a Customer without prior written notice after at least 15-days ("written notice" or "in writing" as used in this

Section shall mean a message sent to the Customer as a SMS or “text” message or in letter form) except for the following reasons:

- a. If a condition immediately dangerous or hazardous to life, physical safety, or property exists; or
 - b. Upon order by any court, the Commission, or any other duly authorized public authority; or
 - c. For a violation of Union’s Terms of Service or these Operating Procedures; or
 - d. If service was obtained fraudulently or without the authorization of the provider or is being used for, or suspected of being used for, fraudulent purposes; or
 - e. Obtaining service by subterfuge that includes, but is not restricted to, an application for service at a location in the name of another party.
2. If Union disconnects service to Lifeline Customer for any reasons stated above, Union will immediately cease seeking reimbursement from the Lifeline universal service fund for that Customer.