

TELEGUAM HOLDINGS, LLC  
624 N. MARINE CORPS DRIVE  
TAMUNING, GUAM 96913



**BEFORE THE GUAM PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF  
TELEGUAM HOLDINGS, LLC ("GTA")  
USAC CERTIFICATION

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)  
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GTA DOCKET NO. 21 - \_\_\_\_

**PETITION OF GTA FOR  
ANNUAL USAC  
CERTIFICATION**

**EVIDENTIARY SUBMISSION OF TELEGUAM HOLDINGS, LLC ("GTA")**

- (1) Confidentially submitted in GTA DOCKET NO. 21 - \_\_\_\_
- (2) Filing Party: Daniel J. Tydingco-TeleGuam Holdings, LLC f/k/a ("GTA")
- (3) Date of Filing: September 3, 2021
- (4) Information Enclosed:
  - a. GTA Five Year Build Out Plan
  - b. FCC Form 481
  - c. GTA Audited Financial Data

**NOTICE OF CONFIDENTIALITY: A PORTION OF THIS DOCKET HAS BEEN  
FILED UNDER SEAL.**

Respectfully submitted this 3rd day of September, 2021.

By: \_\_\_\_\_

Daniel J. Tydingco  
Executive Vice President-Legal & Regulatory



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624 N. MARINE CORPS DRIVE  
TAMUNING, GUAM 96913



**BEFORE THE GUAM PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF  
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USAC CERTIFICATION

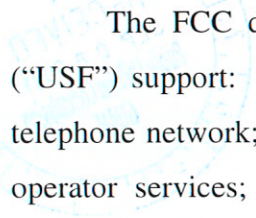
) GTA DOCKET NO. 21 -     

) **PETITION OF GTA FOR**  
) **ANNUAL USAC**  
) **CERTIFICATION**  
)

Teleguam Holdings, LLC, (“GTA”) hereby petitions the Guam Public Utilities Commission (“GPUC”) to grant its certification under 47 C.F.R. § 54.314 and find that GTA is in compliance with Section 254(e) of the Telecommunications Act of 1996 and that it is receiving federal universal support for which that support is intended. In addition, GTA further certifies that all federal high-cost support received in accordance with 47 C.F.R. § 54.314(b) will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. As demonstrated below, GTA meets all of the required Federal Communications Commission (“FCC”) requirements and requests a positive certification be provided by the GPUC before September 30, 2021 for filing to the Universal Service Administration Company (“USAC”) and the FCC.

**I. INTRODUCTION**

Section 254(e) of the Telecommunications Act of 1996 provides that carriers receiving Federal Universal Service Support “shall use that support only for the provision, maintenance, and upgrading of facilities and services for which the support was intended.” Under FCC rules, state public utility commissions must certify annually to USAC that all eligible communication carriers in the state comply with this requirement. In addition, on March 17, 2005, the FCC released the ETC Designation Order under CC Docket No. 96-46, Report and Order, FCC 05-46, making recommendation to state commission to implement certification guidelines for carriers designated as Eligible Telecommunications Carriers (“ETC”) pursuant to Section 214(e)(6).



The FCC designated nine core services that are eligible for Universal Service Fund (“USF”) support: single party service; local usage; voice grade access to the public switched telephone network; dual tone multifrequency signaling; access to emergency services; access to operator services; access to interexchange services; access to directory assistance; and toll limitation service for qualifying low-income consumers.

In addition, under FCC 05-46 the FCC recommended that state commission set additional information requests on an annual basis for carriers seeking designation as an ETC progress report on the ETC’s five year service quality improvement plan; detailed information on any outage lasting at least thirty minutes; the number of requests for service from potential customers that were unfulfilled for the past year; the number of complaints per 1,000 handsets or landlines; certifications that the ETC is complying with applicable service quality standards; certification that ETC is able to function in emergency situation; certifications that ETC is offering a local usage plan that is comparable to the incumbent LEC, and certification that the carrier acknowledge that the Commission may require it to provide equal access.

## **II. GTA COMPLIANCE WITH CORE UNIVERSAL SERVICE OFFERINGS**

In accordance with 47 C.F.R. § 54.101 GTA provides all the core services that are designated for support for USF support. GTA provides many of the core services as part of basic residential and business local line service under its General Exchange Tariff approved by the GPUC. Specifically, through GTA’s tariff its customers are able to purchase single party, unlimited local usage telephone service that utilized dual tone multifrequency signaling. In addition, GTA provides access to 911 and regularly makes updates to the appropriate ANI/ALI database as well as access to operator services, directory assistance and access to interexchange services. Lastly for those low-income customers, GTA provides toll limitation for domestic and international toll calls.

## **III. GTA’s COMPLIANCE WITH ETC DESIGNATION ORDER**

GTA, in its desire to provide as much detail as possible, offers the following comments on its designation of compliance with FCC 05-46. GTA is not aware of the GPUC implementing these requirements through a formal proceeding, however GTA wishes to take a proactive position and offer as much detail as possible in this petition.

(1) Progress report on the ETC's five year service quality improvement plan. GTA respectfully submits its filing for a five-year service quality improvement plan under Exhibit A. GTA requests that it be granted the largest latitude possible in preparing to provide this information, as has not gone through a formal process for this requirement.

(2) Detailed information on any outage lasting at least thirty minutes. GTA had one (1) outage that affected the landline service.

- 6/17/2021: 911 routing issue towards Agana C20 (Current GovGuam 911 system is only connected to Agana C20 due to legacy MF AMI trunk interface on 911 platform)
- Cause: SS7 Signaling Failure
- Duration: 65 minutes
- Impact: Call failures to 911 from external networks traversing GTA Agana C20
- Fix: Implemented new 911 routes for additional redundancy towards GTA Agana C20 for 911 calls. Additional routes are ISDN vs SS& and do not rely on SS7 for call completion.

(3) The number of requests for service from potential customers that were unfulfilled for the past year. The requests GTA was unable to fulfill were due to the subscriber's inability to pay the required deposits for delivery of service or service drops for new subscribers.

(4) The number of complaints per 1,000 handsets or lines. During calendar year 2020 and to date 2021, GTA was not made aware of any end user complaints filed with the GPUC or any other regulatory body.

(5) Certification that the ETC is complying with applicable service quality standards. GTA certifies that it adheres to applicable GPUC service quality standards and FCC rules and orders.

(6) Certification that ETC is able to function in emergency situations. GTA certifies that it has the ability to remain functional in emergency situations. Through the use of its backup electricity generators, buried copper and fiber plant, and backup battery power at its Central Office and Remote Equipment Centers, GTA has the necessary infrastructure and equipment to remain functional in situations that include fires, earthquakes or typhoons.

(7) Certification that the ETC is offering a local usage plan that is comparable to the incumbent LEC. GTA is the incumbent LEC and offers an unlimited local usage plan to its subscribers.

(8) Certification that the carrier acknowledges that the Commission may require it to provide equal access. GTA currently offers equal access to all of its subscribers and therefore in compliance with this requirement.

(9) GTA complies with all Consumer Proprietary Network Information (CPNI) and customer privacy, including local laws relating to consumer protection.

GTA certifies that as a designated ETC it has offered all of the service designated by the FCC for support to pursuant to Section 254(c) of the Federal Act during calendar year 2020 and to date 2021 in compliance with 47 C.F.R. § 54.101. GTA also certifies that it has advertised the ability of supported services and the charges through general media distribution including the direct mailing, Internet, newspaper advertising, and radio. Specifically, GTA ran advertisements in the Guam Daily Post and Guam PDN, as well as provides information on its website for such services including lifeline services.

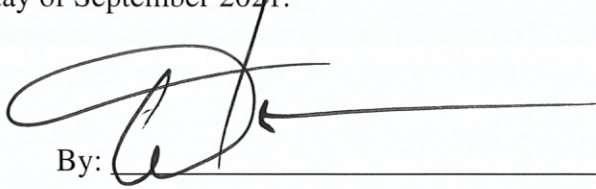
#### **IV. GTA USE OF ELIGIBLE FUNDS**

GTA continues to target and remain committed to use its budgets to continue to enhance its network including investments in the outside plant and invest in new technology for Guam. GTA respectfully submits in Exhibit B its audited financial data for 2019 for demonstration that all of the funds are being used to support core services. In *calendar year 2020, GTA received \$7,393,602* in Broadband Loop Support (CAF/BLS) and \$4,095,148 in *calendar year 2021 to date* in Broadband Loop Support, and *\$266,442 in calendar year 2020 and \$209,606 in calendar year 2021 to date* in Interstate Carrier Compensation (BLS/ICC).

#### **V. CONCLUSION**

For the foregoing reasons, GTA respectfully requests that a positive certification be granted by the GPUC and forwarded to the FCC before September 30, 2021. GTA respectfully requests that this petition be given priority at the earliest convenience.

Respectfully submitted this 3rd day of September 2021.

By: 

Daniel J. Tydingco  
Executive Vice President-Legal & Regulatory  
624 North Marine Corps Drive  
Tamuning, Guam 96913  
671-687-9363





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Tamuning, Guam 96913

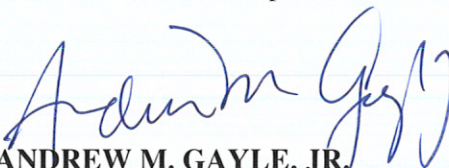
Website: [www.gta.net](http://www.gta.net)  
Telephone: (671) 644 4482

## 2020 HIGH COST SUPPORT USE CERTIFICATION

### OF TELEGUAM HOLDINGS, LLC

#### “GTA”

1. My name is Andrew M. Gayle, Jr. I currently serve as the Chief Operating Officer of TeleGuam Holdings, LLC (GTA), a provider of local and interstate interexchange telecommunications services in the U.S. Territory of Guam. In this capacity, I have become familiar with the operations of TeleGuam and its provisioning, maintenance and upgrading of facilities and services.
2. As an officer of TeleGuam Holdings, LLC, I hereby certify that all federal high-cost support received in accordance with 47 C.F.R. § 54.314(b) will be used only for the provision, maintenance and upgrading of facilities and services for which such support is intended.
3. I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on September 3, 2021.

  
**ANDREW M. GAYLE, JR.**  
Chief Operating Officer



TELEGUAM HOLDINGS, LLC  
624 N. MARINE CORPS DRIVE  
TAMUNING, GUAM 96913

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IN THE MATTER OF	)	GTA DOCKET NO. <u>21-</u>
TELEGUAM HOLDINGS, LLC ("GTA")	)	
USAC CERTIFICATION	)	<b>PETITION OF GTA FOR</b>
	)	<b>ANNUAL USAC</b>
	)	<b>CERTIFICATION</b>
_____	)	

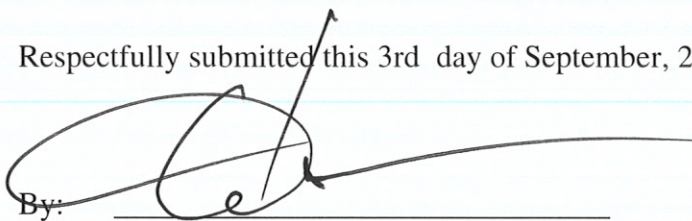
**EVIDENTIARY SUBMISSION OF TELEGUAM HOLDINGS, LLC ("GTA")**

**FILED UNDER SEAL**

a. Exhibit A – GTA Five Year Build Out Plan

**NOTICE OF CONFIDENTIALITY: A PORTION OF THIS DOCKET HAS BEEN  
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Respectfully submitted this 3rd day of September, 2021.

By: 

Daniel J. Tydingco  
Executive Vice President-Legal & Regulatory



YEAR	PROJECT ID	PROJECT NAME	PROJECT TYPE / PURPOSE	CONSUMER	TOTAL COST	START DATE	END DATE	STATUS
2020	34,63	MongMong, Maite	VDSL EXPANSION	667	\$ 191,587.23	6/1/2020	6/30/2020	Planned/Active
	59	Royal Garden, Del Carmen/ Pas	VDSL EXPANSION	382	\$ 66,656.85	7/1/2020	7/17/2020	Planned/Active
		YIGO-E5A1	VDSL EXPANSION	230	\$ 9,898.29	7/18/2020	7/18/2020	Active
		AGAT-E1	VDSL EXPANSION	140	\$ 7,187.84	7/19/2020	7/19/2020	Active
		BARV-E1	VDSL EXPANSION	92	\$ 7,187.84	7/20/2020	7/25/2020	Active
		TALV-E1	VDSL EXPANSION	142	\$ 7,187.84	7/26/2020	7/31/2020	Active
		TALOV-GPON	VDSL EXPANSION	140	\$ 48,960.00	8/1/2020	8/21/2020	Planned
2021		NTIP-GPON	VDSL EXPANSION	230	\$ 59,885.50	8/22/2020	9/21/2020	Planned
	62,63,66	MongMong, Maite	VDSL EXPANSION	1488	\$ 295,586.08	9/22/2020	11/10/2020	Planned
	50	Upper & Lower Latte Hgts	VDSL EXPANSION	1163	\$ 257,697.17	11/11/2020	1/15/2021	Planned
	70	Barrigada Hgts.	VDSL EXPANSION	376	\$ 79,032.41	1/16/2021	2/5/2021	Planned
	49	Alageta	VDSL EXPANSION	182	\$ 117,356.63	2/6/2021	3/2/2021	Planned
	79	Santa Rosa	VDSL EXPANSION	214	\$ 58,195.97	3/3/2021	3/16/2021	Planned
	61	Perezville - LBJ	VDSL EXPANSION	215	\$ 49,371.25	3/17/2021	3/29/2021	Planned
	68	ORDOT	VDSL EXPANSION	681	\$ 172,174.26	3/30/2021	4/24/2021	Planned
	73	NIMITZ HILL - PITI	VDSL EXPANSION	192	\$ 59,828.79	4/25/2021	5/9/2021	Planned
	47	TALO	VDSL EXPANSION	563	\$ 23,908.79	5/10/2021	5/12/2021	Planned
	78	NEW APRA HOUSING	VDSL EXPANSION	101	\$ 51,498.06	5/13/2021	5/21/2021	Planned
	57	PARADISE ESTATES	VDSL EXPANSION	378	\$ 46,950.07	5/22/2021	5/28/2021	Planned
NEW	12	VDSL AAFB	VDSL EXPANSION	889	\$ 278,217.43	5/29/2021	7/28/2021	Planned
	29	West Agana	VDSL EXPANSION	558	\$ 157,027.90	7/29/2021	8/23/2021	Planned
	31	Nimitz	VDSL EXPANSION	282	\$ 140,673.72	8/24/2021	10/1/2021	Planned
	32	Gibson	VDSL EXPANSION	935	\$ 162,453.89	10/2/2021	10/30/2021	Planned
	34	North Mangilao	VDSL EXPANSION	192	\$ 174,459.08	10/31/2021	12/4/2021	Planned
	35	South Mangilao	VDSL EXPANSION	302	\$ 300,677.17	12/5/2021	3/19/2022	Planned
	37	Piti Main	VDSL EXPANSION	123	\$ 80,198.26	3/20/2022	4/1/2022	Planned
	38	Piti Laterals	VDSL EXPANSION	333	\$ 63,401.79	4/2/2022	4/12/2022	Planned
	45	South Agana	VDSL EXPANSION	33	\$ 317,024.17	4/13/2022	6/18/2022	Planned
	46	Yigo Backroad	VDSL EXPANSION	1035	\$ 318,109.53	6/19/2022	8/17/2022	Planned
	47	Talofofo East	VDSL EXPANSION	927	\$ 233,509.39	8/18/2022	11/3/2022	Planned
	49	Barrigada	VDSL EXPANSION	603	\$ 183,079.74	11/4/2022	12/24/2022	Planned
	50	Latte heights	VDSL EXPANSION	1601	\$ 214,041.48	12/25/2022	2/11/2023	Planned
	51	South Gayinero	VDSL EXPANSION	535	\$ 62,451.61	2/12/2023	2/22/2023	Planned
	52	Naval Base	VDSL EXPANSION	696	\$ 170,393.08	2/23/2023	4/10/2023	Planned
	54	Tiyan South	VDSL EXPANSION	4	\$ 58,059.60	4/11/2023	4/29/2023	Planned
	56	IRWO-E1, IRWO-E4A	VDSL EXPANSION	382	\$ 51,073.06	4/30/2023	5/12/2023	Planned
	60	GIBS-E1, GIBS-E3	VDSL EXPANSION	928	\$ 58,751.19	5/13/2023	5/21/2023	Planned
	62	AGAN-E1,AGAN-E13	VDSL EXPANSION	34	\$ 45,066.22	5/22/2023	5/31/2023	Planned
	63	AGAN-E14	VDSL EXPANSION	8	\$ 16,244.97	6/1/2023	6/4/2023	Planned
	64	AGAN-E18C1	VDSL EXPANSION	18	\$ 11,277.16	6/5/2023	6/6/2023	Planned
	65	AGAN-E17D, MANG-E20E	VDSL EXPANSION	888	\$ 158,975.23	6/7/2023	7/19/2023	Planned
	67	TAI-E5, TAI-E6B	VDSL EXPANSION	295	\$ 52,921.82	7/20/2023	7/25/2023	Planned
	68	ORDO-E1, ORDO-E5	VDSL EXPANSION	430	\$ 166,635.09	7/26/2023	9/8/2023	Planned
	69	AGAN-E2F1, AGAN-E2J	VDSL EXPANSION	619	\$ 50,306.37	9/9/2023	9/11/2023	Planned
	70	DEDO-E15, DEDO-E16B	VDSL EXPANSION	212	\$ 82,477.16	9/12/2023	10/5/2023	Planned
	71	GIBS-E7B, GIBS-E7F	VDSL EXPANSION	82	\$ 81,906.41	10/6/2023	10/30/2023	Planned
	72	AGAN-E2A, AGAN-E6F4	VDSL EXPANSION	147	\$ 103,812.39	10/31/2023	11/19/2023	Planned
	73	PITI-E11A, PITI-E11F7	VDSL EXPANSION	310	\$ 130,170.98	11/20/2023	1/4/2024	Planned
	74	PITI-E10A, PITI-E11J	VDSL EXPANSION	30	\$ 104,939.76	1/5/2024	2/10/2024	Planned
	75	AGAT-E4H, AGAT-E4P	VDSL EXPANSION	347	\$ 160,234.49	2/11/2024	3/9/2024	Planned
	76	AGAT-E12, PITI-E13	VDSL EXPANSION	48	\$ 104,292.24	3/10/2024	4/1/2024	Planned
	77	AGAT-E2, AGAT-E7A1	VDSL EXPANSION	219	\$ 92,199.75	4/2/2024	4/17/2024	Planned
	78	AGAT-E4A, AGAT-E7C	VDSL EXPANSION	618	\$ 164,207.99	4/18/2024	5/23/2024	Planned
	79	AGAT-E13, AGAT-E7G1	VDSL EXPANSION	827	\$ 183,801.26	5/24/2024	7/6/2024	Planned
	80	INAR-E11, TALO-E37	VDSL EXPANSION	476	\$ 224,823.34	7/7/2024	9/18/2024	Planned
	81	TALO-E26, TALO-E30A	VDSL EXPANSION	267	\$ 95,952.67	9/19/2024	10/22/2024	Planned
	82	TALO-E1, TALO-E2A	VDSL EXPANSION	777	\$ 223,690.13	10/23/2024	12/31/2024	Planned
	83	TALO-E31A, TALO-E40	VDSL EXPANSION	434	\$ 130,355.56	1/1/2025	2/15/2025	Planned
	84	TALO-E3, TALO-E8B	VDSL EXPANSION	379	\$ 126,259.69	2/16/2025	3/30/2025	Planned
					\$ 7,144,303.65			



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**EVIDENTIARY SUBMISSION OF TELEGUAM HOLDINGS, LLC ("GTA")**

**FILED UNDER SEAL**

b. Exhibit B – FCC Form 481

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Respectfully submitted this 3rd day of September, 2021.

By: 

Daniel J. Tydingco  
Executive Vice President-Legal & Regulatory



CONFIDENTIAL

<010>	Study Area Code	663800
<015>	Study Area Name	GTA TELECOM, LLC
<020>	Program Year	2022
<030>	Contact Name: Person USAC should contact with questions about this data	Lucille McIntosh
<035>	Contact Telephone Number: Number of the person identified in data line <030>	6716441660 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	lmcintosh@gta.net
	Form Type	54.313 and 54.422

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
December 2020

<010>	Study Area Code	663800
<015>	Study Area Name	GTA, TELECOM, LLC
<020>	Program Year	2022
<030>	Contact Name - Person USAC should contact regarding this data	Lucille McIntosh
<035>	Contact Telephone Number - Number of person identified in data line <030>	6716441660 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lmcintoshgta.net
<210>	For the prior calendar year, were there any reportable voice service outages?	
<220>		

(400) Number of Complaints per 1,000 customers  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
December 2020

<010>	Study Area Code	663800
<015>	Study Area Name	GTA TELECOM, LLC
<020>	Program Year	2022
<030>	Contact Name - Person USAC should contact regarding this data	Lucille McIntosh
<035>	Contact Telephone Number - Number of person identified in data line <030>	6716441660 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lmcintosh@gta.net
<400>	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.	
<410>	Complaints per 1000 customers for fixed voice	
<420>	Complaints per 1000 customers for mobile voice	

CONFIDENTIAL

(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  
December 2020

<010>	Study Area Code	663900
<015>	Study Area Name	GTA TELECOM, LLC
<020>	Program Year	2022
<030>	Contact Name - Person USAC should contact regarding this data	Lucille McIntosh
<035>	Contact Telephone Number - Number of person identified in data line <030>	6716441660 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lmcintosh@gta.net
<515>	Certify compliance with applicable minimum service standards	

**(600) Functionality in Emergency Situations  
Data Collection Form****CONFIDENTIAL**FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
December 2020

<010>	Study Area Code	663800
<015>	Study Area Name	GTA TELECOM, LLC
<020>	Program Year	2022
<030>	Contact Name - Person USAC should contact regarding this data	Lucille McIntosh
<035>	Contact Telephone Number - Number of person identified in data line <030>	4716441660 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lmcintosh@gtat.net
<600>	Certify compliance regarding ability to function in emergency situations	Yes
<610>	Descriptive document for Functionality in Emergency Situations	663800gu610.pdf

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
December 2020

[illegible]

(900) Tribal Lands Reporting  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
December 2020

<010>	Study Area Code	663800
<015>	Study Area Name	GTA TELECOM, LLC
<020>	Program Year	2022
<030>	Contact Name - Person USAC should contact regarding this data	Lucille McIntosh
<035>	Contact Telephone Number - Number of person identified in data line <030>	671641660 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lmcintosh@gta.net

<900> Does the filing entity offer tribal land services? (Y/N) No

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached PDF, on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(5) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable

**(1000) Voice and Broadband Service Rate Comparability Data Collection Form**

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
December 2020

<010>	Study Area Code	663800
<015>	Study Area Name	GTA TELECOM, LLC
<020>	Program Year	2022
<030>	Contact Name - Person USAC should contact regarding this data	Lucille McIntosh
<035>	Contact Telephone Number - Number of person identified in data line <030>	6716441660 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lmcintosh@gta.net

<1000> Voice services rate comparability certification Yes

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

663800gu1010.pdf

Name of Attached Document

<1020> Broadband comparability certification  
Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau

<1030> Attach detailed description for broadband comparability compliance

663800gu1030.pdf

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  
December 2020

<010>	Study Area Code	663800
<015>	Study Area Name	GTA, TELBECOM, LLC
<020>	Program Year	2022
<030>	Contact Name - Person USAC should contact regarding this data	Lucille McIntosh
<035>	Contact Telephone Number - Number of person identified in data line <030>	6716441660 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lmcintosh@gta.net

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

Yes

<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).

<1140> Alaska Plan rate-of-return certification (yes, no, or not applicable) of compliance with approved performance plan.

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

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
December 2020

<010>	Study Area Code	663800
<015>	Study Area Name	GTA TELECOM, LLC
<020>	Program Year	2022
<030>	Contact Name - Person USAC should contact regarding this data	Lucille McIntosh
<035>	Contact Telephone Number - Number of person identified in data line <030>	6716441660 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lmcintosh@ata.net

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP <https://www.gta.net/home-phone/lifeline/>

"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,	<input checked="" type="checkbox"/>
<1222>	Details on the number of minutes provided as part of the plan,	<input checked="" type="checkbox"/>
<1223>	Additional charges for toll calls, and rates for each such plan.	<input checked="" type="checkbox"/>

(2005) Price Cap Carrier Additional Documentation		FCC Form 481
Data Collection Form		OMB Control No. 3060-0986/OMB Control No. 3060-0819
Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers		December 2020

<010>	Study Area Code	663800
<015>	Study Area Name	GTA TELECOM, LLC
<020>	Program Year	2022
<030>	Contact Name - Person USAC should contact regarding this data	Lucille McIntosh
<035>	Contact Telephone Number - Number of person identified in data line <030>	6716441660 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lmcintosh@gta.net

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of frozen 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(c)(d),(e). The information reported on this form and in the documents attached below is accurate.

<2015> 2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)

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 2018.

<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)

Name of Attached Document Listing  
Required Information

Connect America Phase II – FCC Form 470 Postings

<2019> For the filing due July 1 following full implementation of this requirement, answer yes, no, or not applicable to this certification request

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

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
December 2020

<010>	Study Area Code	663800
<015>	Study Area Name	GTA TELECOM, LLC
<020>	Program Year	2022
<030>	Contact Name - Person USAC should contact regarding this data	Lucille McIntosh
<035>	Contact Telephone Number - Number of person identified in data line <030>	6716441660 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lmcintosh@gtta.net

(3007)

Does this filing retain a Cost Consultant and/or Firm, or other Third Party to prepare financial and operations data disclosures submitted to the National Exchange Carrier Association (NECA), USAC, or the Administrator?

Yes

(3007a)		(3007b)
Name of Consultant		Name of Consultant Firm/Third Party
Mark Ellmer		JSI

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

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
December 2020

<010>	Study Area Code	663800
<015>	Study Area Name	GTA TELECOM, LLC
<020>	Program Year	2022
<030>	Contact Name - Person USAC should contact regarding this data	Lucille McIntosh
<035>	Contact Telephone Number - Number of person identified in data line <030>	6716441660 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lmcintosh@gta.net

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.

(3009) Progress Report on 5 Year Plan  
Carrier certifies to 54.313(f)(1)(iii)

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

Yes - Attach Certification

(3010B) Please Provide Attachment

Name of Attached Document Listing Required Information

663800gu3010.pdf

**Rate-of-Return Community Anchor Institutions**

(3012A) Indicate if the carrier newly deployed broadband service to community anchor institution(s) in the previous calendar year.

No - No New Community Anchors

(3012B) Please Provide Attachment

Name of Attached Document Listing Required Information

Using link, download template and list the number, name and address for each community anchor institution. Attach the document which contains the community anchor institution details as required by 47 C.F.R. § 54.313(f)(1)(ii)

(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)

☐ ☒

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)

☒ ☐

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

663800gu3026.pdf

(3005) Rate Of Return Carrier Additional Documentation (Continued)

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
December 2020

Data Collection Form

<010>	Study Area Code	663800
<015>	Study Area Name	GTA TELECOM, LLC
<020>	Program Year	2022
<030>	Contact Name - Person USAC should contact regarding this data	Lucille McIntosh
<035>	Contact Telephone Number - Number of person identified in data line <030>	6716441660 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lmcintosh@cta.net

Financial Data Summary

(3027) Revenue

103334247

(3028) Operating Expenses

89524153

(3029) Net Income

594413

(3030) Telephone Plant In Service(TPIS)

90553207

(3031) Total Assets

204456134

(3032) Total Debt

135491141

(3033) Total Equity

55299958

(3034) Dividends

0

(4005) Rural Broadband Experiment Additional Documentation  
Data Collection Form

FCC Form 481

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

December 2020

<010>	Study Area Code	663800
<015>	Study Area Name	GTA TELECOM, LLC
<020>	Program Year	2022
<030>	Contact Name - Person USAC should contact regarding this data	Lucille McIntosh 6716441000 ext.
<035>	Contact Telephone Number - Number of person identified in data line <030>	
<039>	Contact Email Address - Email Address of person identified in data line <030>	lmcintosh@gta.net

#### 4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations and provide a list of newly served community anchor institutions.

##### 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 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.

##### RBE Community Anchor Institutions

<4003a> Indicate if the carrier newly deployed broadband service to community anchor institution(s) in the previous calendar year

<4003b> Please Provide Attachment: Using link, download template and list the number, name and address for each community anchor institution. Attach the document which contains the community anchor institution details as required by FCC 14-98 (paragraph 79)

Name of Attached Document Listing Required Information

<010>	Study Area Code	663800
<015>	Study Area Name	GTA TELECOM, LLC
<020>	Program Year	2022
<030>	Contact Name - Person USAC should contact regarding this data	Lucille McIntosh
<035>	Contact Telephone Number - Number of person identified in data line <030>	6714441650 DMR
<039>	Contact Email Address - Email Address of person identified in data line <030>	lmcintosh@gta.net

(5012)	If the filing carrier identified in its approved performance plans that it relies exclusively on satellite backhaul for a certain portion of the population in its service area, indicate whether any terrestrial backhaul or other satellite backhaul became commercially available in the previous calendar year in areas that were previously served exclusively by satellite backhaul.	(Yes/No)
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(6005) Phase II Auction Reporting  
Data Collection Form

FCC Form 481

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

December 2020

<010>	Study Area Code	663800
<015>	Study Area Name	GTA TELECOM, LLC
<020>	Program Year	2022
<030>	Contact Name - Person USAC should contact regarding this data	Lucille McIntosh
<035>	Contact Telephone Number - Number of person identified in data line <030>	8712441550 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lmcintosh@gta.net

<6010> Enter the total amount of Phase II Auction Support, if any, the carrier used for capital expenditures

## Phase II Auction and New York Funds Certification

<6011> Certify (either yes or no) regarding whether the recipient has available funds for all project costs that will exceed the amount of support that will be received for the next calendar year. This certification must be provided starting the first July 1st after receiving support until the recipient's penultimate year of support (Yes/No)

## Phase II Auction Community Anchor Institutions

<6012a> Indicate if the carrier newly deployed broadband service to community anchor institution(s) in the previous calendar year

<6012b> Please Provide Attachment Using link, download template and list the number, name and address for each community anchor institution. Attach the document which contains the community anchor institution details as required by FCC 14-98 (paragraph 79) Name of Attached Document Listing Required Information

## Phase II Auction FCC Form 470 Postings

<6013> For the filing due July 1 following full implementation of this requirement answer yes or no to this certification request

## Phase II Auction Post-Final Deployment Milestone Performance Certification

<6014> Starting the first July 1st after meeting the final service milestone, certify (yes or no) that the Phase II-funded network that the Phase II auction recipient operated in the prior year meets the relevant performance requirements in § 54.309

(7005) Phase-Down Support Reporting  
Data Collection Form

**CONFIDENTIAL**

FCC Form 481

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

December 2020

<010>	Study Area Code	663#00
<015>	Study Area Name	OTA TELECOM, LLC
<020>	Program Year	2022
<030>	Contact Name - Person USAC should contact regarding this data	Lucille McIntosh
<035>	Contact Telephone Number - Number of person identified in data line <030>	6710441550 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lmcintosh@ota.net

<7010> Phase II Auction recipient performance requirements certification (Yes/No)

(8005) Uniendo a Puerto Rico Fixed and Mobile Funds Certification  
Data Collection Form

FCC Form 481

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

December 2020

<010>	Study Area Code	663800
<015>	Study Area Name	GTA TELECOM, LLC
<020>	Program Year	2022
<030>	Contact Name - Person USAC should contact regarding this data	Lucille McIntosh
<035>	Contact Telephone Number - Number of person identified in data line <030>	8716441550 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lmcintosh@gta.net

**<8010> Uniendo a Puerto Rico Stage 2 Fixed – Capital Expenditures**

Enter the total amount of Uniendo a Puerto Rico Stage 2 fixed support, if any, the carrier used for capital expenditures.

**<8011> Uniendo a Puerto Rico Stage 2 Fixed – Available Funds Certification**

Certify (either yes or no) regarding whether the recipient has available funds for all project costs that will exceed the amount of support that will be received for the next calendar year. This certification must be provided starting the first July 1st after receiving support until the recipient's penultimate year of support.

**<8012a> Uniendo a Puerto Rico Stage 2 Fixed – Community Anchor Institutions**

Indicate if the carrier newly deployed broadband service to community anchor institution(s) in the previous calendar year.

Please Provide Attachment

<8012b> Using link, download template and list the number, name and address for each community anchor institution. Attach the document which contains the community anchor institution details as required by 47 C.F.R. § 54.313(e)(2)(A). Allowable File Types.

Name of Attached Document Listing Required Information

**Uniendo a Puerto Rico Stage 2 Fixed – FCC Form 470 Postings**

<8013> For the filing due July 1 following full implementation of this requirement answer yes, no, or not applicable to this certification request.

**<8014> Uniendo a Puerto Rico Stage 2 Fixed – Post-Final Deployment Milestone Performance Certification**

Starting the first July 1st after meeting the final service milestone, certify (yes or no) that the Uniendo a Puerto Rico Stage 2-funded network that the Stage 2 recipient operated in the prior year meets the relevant performance requirements in § 54.309.

**<8020> Uniendo a Puerto Rico Stage 2 Fixed – Support Reimbursement Certification**

54.313(n): Recipients of Uniendo a Puerto Rico Fund Stage 2 fixed support shall certify that such support was not used for costs that are (or will be) reimbursed by other sources of support, including of federal or local government aid or insurance reimbursements; and that support was not used for other purposes, such as the retirement of company debt unrelated to eligible expenditures, or other expenses not directly related to network restoration, hardening, and expansion consistent with the framework of the Uniendo a Puerto Rico Fund.

**<8030> Uniendo a Puerto Rico Stage 2 Fixed – Disaster Preparedness and Response Documentation**

54.313(n): Recipients of fixed support from Stage 2 of the Uniendo a Puerto Rico Fund shall certify that they have conducted an annual review of the documentation required by section 54.1515(a)-(c) to determine the need for and to implement changes or revisions to disaster preparation and recovery documentation.

**<8040> Uniendo a Puerto Rico Stage 2 Mobile – Support Reimbursement**

54.313(n): Recipients of Uniendo a Puerto Rico Fund Stage 2 mobile support shall certify that such support was not used for costs that are (or will be) reimbursed by other sources of support, including of federal or local government aid or insurance reimbursements; and that support was not used for other purposes, such as the retirement of company debt unrelated to eligible expenditures, or other expenses not directly related to network restoration, hardening, and expansion consistent with the framework of the Uniendo a Puerto Rico Fund.

**<8050> Uniendo a Puerto Rico Stage 2 Mobile – Disaster Preparedness and Response Documentation**

54.313(n): Recipients of mobile support from Stage 2 of the Uniendo a Puerto Rico Fund shall certify that they have conducted an annual review of the documentation required by section 54.1515(a)-(c) to determine the need for and to implement changes or revisions to disaster preparation and recovery documentation

**<8060> Uniendo a Puerto Rico Stage 2 Mobile – Mobile Disbursements Certification**

54.313(o): Recipients of Uniendo a Puerto Rico Fund Stage 2 mobile support shall certify that they are in compliance with all requirements for receipt of such support to continue receiving Stage 2 mobile disbursements

(9005) Connect USVI Fixed and Mobile Funds Certification  
Data Collection Form

FCC Form 481

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

December 2020

<010>	Study Area Code	663800
<015>	Study Area Name	GTA TELECOM, LLC
<020>	Program Year	2022
<030>	Contact Name - Person USAC should contact regarding this data	Lucille McIntosh
<035>	Contact Telephone Number - Number of person identified in data line <030>	6716441660 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lmcintosh@gta.net

**<9010> Connect USVI Stage 2 Fixed – Capital Expenditures**

Enter the total amount of Connect USVI Fund Stage 2 fixed support, if any, the carrier used for capital expenditures.

**<9011> Connect USVI Stage 2 Fixed – Available Funds Certification**

Certify (either yes or no) regarding whether the recipient has available funds for all project costs that will exceed the amount of support that will be received for the next calendar year. This certification must be provided starting the first July 1st after receiving support until the recipient's penultimate year of support.

**<9012a> Connect USVI Stage 2 Fixed – Community Anchor Institutions**

Indicate if the carrier newly deployed broadband service to community anchor institution(s) in the previous calendar year.

Please Provide Attachment

**<9012b>** Using link, download template and list the number, name and address for each community anchor institution. Attach the document which contains the community anchor institution details as required by 47 C.F.R. § 54.313(e)(2)(i)(A).

Name of Attached  
Document Listing Required  
Information

**Connect USVI Stage 2 Fixed – FCC Form 470 Postings**

**<9013>** For the filing due July 1 following full implementation of this requirement answer yes, no, or not applicable to this certification request.

**Connect USVI Stage 2 Fixed – Post-Final Deployment Milestone Performance Certification**

**<9014>** Starting the first July 1st after meeting the final service milestone, certify (yes or no) that the Connect USVI Fund Stage 2-funded network that the Stage 2 recipient operated in the prior year meets the relevant performance requirements in § 54.309.

**Connect USVI Stage 2 Fixed – Support Reimbursement Certification**

**<9020>** 54.313(n): Recipients of Connect USVI Fund Stage 2 fixed support shall certify that such support was not used for costs that are (or will be) reimbursed by other sources of support, including of federal or local government aid or insurance reimbursements; and that support was not used for other purposes, such as the retirement of company debt unrelated to eligible expenditures, or other expenses not directly related to network restoration, hardening, and expansion consistent with the framework of the Connect USVI Fund.

**Connect USVI Stage 2 Fixed – Disaster Preparedness and Response Documentation**

**<9030>** 54.313(n): Recipients of fixed support from Stage 2 of the Connect USVI Fund shall certify that they have conducted an annual review of the documentation required by section 54.1515(a)-(c) to determine the need for and to implement changes or revisions to disaster preparation and recovery documentation.

**Connect USVI Fund Stage 2 Mobile - Support Reimbursement Certification**

**<9040>** 54.313(n): Recipients of Connect USVI Fund Stage 2 mobile support shall certify that such support was not used for costs that are (or will be) reimbursed by other sources of support, including of federal or local government aid or insurance reimbursements; and that support was not used for other purposes, such as the retirement of company debt unrelated to eligible expenditures, or other expenses not directly related to network restoration, hardening, and expansion consistent with the framework of the Connect USVI Fund. Recipients of mobile support from Stage 2 of the Connect USVI Fund shall certify that they have conducted an annual review of the documentation required by section 54.1515(a)-(c) to determine the need for and to implement changes or revisions to disaster preparation and recovery documentation.

**Connect USVI Fund Stage 2 Mobile - Disaster Preparedness and Response Documentation**

**<9050>** 54.313(n): Recipients of mobile support from Stage 2 of the Connect USVI Fund shall certify that they have conducted an annual review of the documentation required by section 54.1515(a)-(c) to determine the need for and to implement changes or revisions to disaster preparation and response documentation.

**Connect USVI Fund Stage 2 Mobile - Mobile Disbursements Certification**

**<9060>** 54.313(o): Recipients of Connect USVI Fund Stage 2 mobile support shall certify that they are in compliance with all requirements for receipt of such support to continue receiving Stage 2 mobile disbursements.

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**Certification - Reporting Carrier  
Data Collection Form**

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
December 2020

<010>	Study Area Code	663800
<015>	Study Area Name	GTA TELECOM, LLC
<020>	Program Year	2022
<030>	Contact Name - Person USAC should contact regarding this data	Lucille McIntosh
<035>	Contact Telephone Number - Number of person identified in data line <030>	6716441660 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lmcintosh@gta.net

**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:
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.	

# CONFIDENTIAL

**Certification - Agent / Carrier  
Data Collection Form**
**FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
December 2020**

<010> Study Area Code	663800
<015> Study Area Name	GTA TELECOM, LLC
<020> Program Year	2022
<030> Contact Name - Person USAC should contact regarding this data	Lucille McIntosh
<035> Contact Telephone Number - Number of person identified in data line <030>	6716441660 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	lmcintosh@gta.net

**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) _____ 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: _____	
Name of Reporting Carrier: GTA TELECOM, LLC	
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: 663800	Filing Due Date for this form: 07/01/2021
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 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: GTA TELECOM, LLC	
Name of Authorized Agent Firm: _____	
Signature of Authorized Agent or Employee of Agent: _____	Date: 06/09/2021
Name of Authorized Agent Employee: _____	
Title or position of Authorized Agent or Employee of Agent: _____	
Telephone number of Authorized Agent or Employee of Agent: _____	
Study Area Code of Reporting Carrier: 663800	Filing Due Date for this form: 07/01/2021
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.	

Certify Filing  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
December 2020

<010>	Study Area Code	463800
<015>	Study Area Name	OTA TELECOM, LLC
<020>	Program Year	2022
<030>	Contact Name - Person USAC should contact regarding this data	Lucille McIntosh
<035>	Contact Telephone Number - Number of person identified in data line <030>	6716441660 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lmcintosh@ota.net

I certify under penalty of perjury that no universal service support has been or will be used to purchase, obtain, maintain, improve, modify, or otherwise support any equipment or services produced or provided by any company designated by the Federal Communications Commission as posing a national security threat to the integrity of communications networks or the communications supply chain since the effective date of the designations

Please Provide Waiver Document  
Allowable File Type (pdf only)

Name of Attached Document Listing Required  
Information

**CONFIDENTIAL**

Attachments

**TeleGuam Holdings LLC's Ability to Function in Emergency Situations**

TeleGuam Holdings LLC ("Company") hereby certifies that it is able to function in emergency situations as set forth in §54.201(a)(2).<sup>1</sup> 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 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 fuel. The Company complies with the FCC's backup power requirements, effective October 16, 2015.

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<sup>1</sup> Section 54.201(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."

**(800) Operating Companies  
Data Collection Form**

<010> Study Area Code

<015>	Study Area Name
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100	100

<020>	Program Year

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

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

<039> Contact Email Address - Email Address of person identified in data line <030> [1mcintosh@ga.net](mailto:1mcintosh@ga.net)

<810> Reporting Carrier  
TeleGuam Holdings, LLC fka GTA Telecom LLC

<811> Holding Company  
Forager Holdings Corp.

<812> Operating Company

TeleGuam Holdings, LLC fka GTA Telecom LLC

<813>

## Doing Business As Company or Brand Designation

**SAC**

## Affiliates

GTA Services, LLC

**Line 1010 – Description of Voice Services Rate Comparability**

TeleGuam Holdings, LLC fka GTA Telecom LLC's rate for residential voice service is \$26.02 per month which is no more than two standard deviations above the applicable national average urban rate (\$54.75)<sup>1</sup> as published annually by the Wireline Competition Bureau, as required in 47 C.F.R. § 54.313(a)(2).

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<sup>1</sup> Wireline Competition Bureau and Office of Economics and Analytics Announce Results of 2021 Urban Rate Survey for Fixed Voice and Broadband Services, Porting of Survey Data and Explanatory Notes, and Required Minimum Usage Allowance for Eligible Telecommunications Carriers, WC Docket No. 10-90, Public Notice, 35 FCC Rcd 13667 (Nov. 30, 2020) (November 30, 2020 Public Notice).

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**Line 1030 – Description of Broadband Services Rate Comparability**

**TeleGuam Holdings, LLC fka GTA Telecom LLC** has at least one broadband service that is offered at no more than the applicable benchmark for a comparable fixed wireline service in urban areas as required in 47 C.F.R. § 54.313(a)(3).<sup>1</sup>

**TeleGuam Holdings, LLC fka GTA Telecom LLC's** broadband service rate that meets this requirement is show below:

Download Speed - 50 (Mbps)  
Upload Speed - 5 (Mbps)  
Usage Allowance (GB) - Unlimited  
Company Rate - \$ 99.00  
US Benchmark Rate - \$102.04

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<sup>1</sup> Wireline Competition Bureau and Office of Economics and Analytics Announce Results of 2021 Urban Rate Survey for Fixed Voice and Broadband Services, Porting of Survey Data and Explanatory Notes, and Required Minimum Usage Allowance for Eligible Telecommunications Carriers, WC Docket No. 10-90, Public Notice, 35 FCC Rcd 13667 (Nov. 30, 2020) (November 30, 2020 Public Notice).

**GTA Telecom, LLC SAC 663800****Response to Line 3010 – Milestone Certification (47 CFR §54.313(f)(1)(i))****CAF-BLS**

GTA Telecom, LLC (the “Company”) is a rate-of-return carrier that is a recipient of Connect America Fund-Broadband Loop Support (CAF-BLS) support and is subject to the specific 5-year build-out obligations as set forth in 47 CFR §54.308 (a)(2). This rule requires the Company to offer broadband service at actual speeds of at least 25 Mbps downstream / 3 Mbps upstream, over a five-year period, to a defined number of unserved locations. The five-year period began January 1, 2019 and ends December 31, 2023.

In fulfillment of this five-year build-out requirement and pursuant to 47 CFR §54.313 (f)(1)(i)s, the Company hereby certifies that throughout 2020, it took reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 25 Mbps downstream / 3 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 25 Mbps downstream / 3 Mbps upstream is unreasonable, the Company offers broadband service at the highest available speed.

In addition to the certification made above, further proof that the Company is progressing towards meeting its required buildout obligations can be found in USAC’s HUBB portal. Pursuant to 47 CFR §54.316 (a)(3), the Company reports any newly served locations in USAC’s HUBB portal by March 1 each year for the previous calendar year.



TELEGUAM HOLDINGS, LLC  
624 N. MARINE CORPS DRIVE  
TAMUNING, GUAM 96913

**BEFORE THE GUAM PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF  
TELEGUAM HOLDINGS, LLC ("GTA")  
USAC CERTIFICATION

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)  
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)  
)

GTA DOCKET NO. 21 -     

**PETITION OF GTA FOR  
ANNUAL USAC  
CERTIFICATION**

**EVIDENTIARY SUBMISSION OF TELEGUAM HOLDINGS, LLC ("GTA")**

**FILED UNDER SEAL**

c. Exhibit C – GTA Audited Financial Data

**NOTICE OF CONFIDENTIALITY: A PORTION OF THIS DOCKET HAS BEEN  
FILED UNDER SEAL.**

Respectfully submitted this 3<sup>rd</sup> day of September 2021.

By: \_\_\_\_\_

Daniel J. Tydingco  
Executive Vice President-Legal & Regulatory



1012039-2023

**CONFIDENTIAL**

*Consolidated Financial Statements*

**TeleGuam Holdings, Inc. and Subsidiary**  
*(A Wholly Owned Subsidiary of Forager Holdings Corp.)*

*Years ended December 31, 2020 and 2019*  
*with Report of Independent Auditors*

Confidential





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Suite 201 Ernst & Young Building  
Tamuning, Guam 96913

Tel: +1 671 649 3700  
Fax: +1 671 649 3920  
ey.com

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## Report of Independent Auditors

The Board of Directors and Shareholder  
TeleGuam Holdings, Inc.

We have audited the accompanying consolidated financial statements of TeleGuam Holdings, Inc. and subsidiary (a wholly owned subsidiary of Forager Holdings Corp.), which comprise the consolidated balance sheets as of December 31, 2020 and 2019, and the related consolidated statements of operations, changes in shareholder's equity and cash flows for the years then ended, and the related notes to the consolidated financial statements.

### Management's Responsibility for the Financial Statements

Management is responsible for the preparation and fair presentation of these financial statements in conformity with U.S. generally accepted accounting principles; this includes the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free of material misstatement, whether due to fraud or error.

### Auditor's Responsibility

Our responsibility is to express an opinion on these financial statements based on our audits. We conducted our audits in accordance with auditing standards generally accepted in the United States. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the financial statements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

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**Opinion**

In our opinion, the financial statements referred to above present fairly, in all material respects, the consolidated financial position of TeleGuam Holdings, Inc. and subsidiary at December 31, 2020 and 2019, and the consolidated results of their operations and their cash flows for the years then ended in conformity with U.S. generally accepted accounting principles.

*Ernst + Young LLP*

March 24, 2021

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TeleGuam Holdings, Inc. and Subsidiary  
(A Wholly Owned Subsidiary of Forager Holdings Corp.)

**CONFIDENTIAL**

Consolidated Balance Sheets

	December 31,	
	<u>2020</u>	<u>2019</u>
<b>Assets</b>		
Current assets:		
Cash and cash equivalents	\$ 7,206,748	\$ 4,172,515
Accounts receivable, net	3,067,257	4,571,238
Contract assets	6,396,178	8,198,886
Other receivables	1,417,339	2,345,142
Inventories and supplies, net	5,401,572	6,466,548
Prepaid expenses and other assets	<u>2,398,239</u>	<u>1,737,878</u>
Total current assets	25,887,333	27,492,207
Property, plant and equipment, net	90,553,207	86,729,301
Goodwill	52,796,596	60,816,328
Intangible assets, net	22,575,910	23,386,513
Investment in joint venture	7,031,320	3,500,888
Other assets, net	1,948,020	2,185,264
Deferred tax assets, net	<u>3,663,748</u>	<u>5,211,497</u>
Total assets	<u>\$204,456,134</u>	<u>\$209,321,998</u>
<b>Liabilities and shareholder's equity</b>		
Current liabilities:		
Current installments of long-term debt	\$ 1,462,000	\$ 1,462,000
Trade accounts payable	7,352,864	9,992,338
Due to related parties	1,930,345	1,038,375
Accrued liabilities and other	2,159,565	2,585,701
Customer deposits	821,889	1,359,115
Deferred revenue	<u>369,957</u>	<u>215,379</u>
Total current liabilities	14,096,620	16,652,908
Long-term debt, less current installments	134,029,141	136,931,348
Other noncurrent liabilities	<u>1,030,415</u>	<u>1,032,197</u>
Total liabilities	149,156,176	154,616,453
Shareholder's equity	<u>55,299,958</u>	<u>54,705,545</u>
Total liabilities and shareholder's equity	<u>\$204,456,134</u>	<u>\$209,321,998</u>

TeleGuam Holdings, Inc. and Subsidiary  
(A Wholly Owned Subsidiary of Forager Holdings Corp.)

Consolidated Statements of Operations

CONFIDENTIAL

	Year ended December 31,	
	<u>2020</u>	<u>2019</u>
Revenues:		
Revenue from contracts with customers	\$ 95,850,863	\$ 100,455,195
Other	<u>7,483,384</u>	<u>9,015,204</u>
Total revenues	<u>103,334,247</u>	<u>109,470,399</u>
Expenses:		
Operating expenses	65,374,500	69,721,931
Depreciation and amortization	<u>24,149,653</u>	<u>23,887,285</u>
Total expenses	<u>89,524,153</u>	<u>93,609,216</u>
Earnings from operations	13,810,094	15,861,183
Other income (expense):		
Share in net income of investee	15,713	---
Others, net	( 2,660,329)	( 2,272,181)
Interest expense	<u>( 9,220,065)</u>	<u>( 13,614,018)</u>
Earnings (loss) before income tax expense	1,945,413	( 25,016)
Income tax expense	<u>1,351,000</u>	<u>609,000</u>
Net earnings (loss)	<u>\$ 594,413</u>	<u>\$ ( 634,016)</u>

TeleGuam Holdings, Inc. and Subsidiary  
(A Wholly Owned Subsidiary of Forager Holdings Corp.)

**CONFIDENTIAL**

Consolidated Statements of Changes in Shareholder's Equity

	Year ended December 31,	
	<u>2020</u>	<u>2019</u>
Capital Stock and Paid-In Capital	\$ <u>75,000,000</u>	\$ <u>75,000,000</u>
Deficit:		
Balance at beginning of year	(20,294,455)	(19,660,439)
Net earnings (loss)	<u>594,413</u>	( <u>634,016</u> )
Balance at end of year	( <u>19,700,042</u> )	( <u>20,294,455</u> )
Total shareholder's equity	\$ <u>55,299,958</u>	\$ <u>54,705,545</u>

TeleGuam Holdings, Inc. and Subsidiary  
(A Wholly Owned Subsidiary of Forager Holdings Corp.)

Consolidated Statements of Cash Flows

CONFIDENTIAL

	December 31,	
	<u>2020</u>	<u>2019</u>
<b>Operating activities</b>		
Net earnings (loss)	\$ 594,413	\$( 634,016)
Adjustments to reconcile net earnings (loss) to net cash provided by operating activities:		
Depreciation and amortization	24,134,975	23,871,894
Provision for bad debts	1,532,154	1,457,580
Deferred income tax expense	1,351,000	609,000
Amortization of deferred loan cost	1,336,768	2,102,292
Provision for inventory obsolescence	460,000	460,000
Accretion on asset retirement obligation	14,837	15,391
Loss from disposal of property and equipment	10,704	58,540
Share in net income of investee	( 15,713)	---
Changes in operating assets and liabilities:		
Accounts and other receivables, net	899,630	30,478
Contract assets	1,802,708	( 1,755,485)
Inventories and supplies, net	604,976	( 1,653,033)
Prepaid expenses and other current assets	( 660,361)	706,268
Other assets, net	( 165,695)	( 6,611)
Deferred tax assets, net	196,749	---
Trade accounts payable	( 2,639,474)	5,050,037
Due to related parties	891,970	789,434
Accrued liabilities and other current liabilities	( 426,136)	27,555
Customer deposits and deferred revenue	( 382,648)	( 614,811)
Other noncurrent liabilities	( 16,619)	18,322
Net cash provided by operating activities	<u>29,524,238</u>	<u>30,532,835</u>
<b>Investing activities</b>		
Purchases of property, plant and equipment	( 18,055,863)	(16,156,608)
Investment in joint venture	( 3,514,719)	( 3,500,888)
Purchases of intangible assets	( 680,448)	( 492,895)
Cash used in investing activities	<u>(22,251,030)</u>	<u>(20,150,391)</u>
<b>Financing activities</b>		
Principal payments of long-term debt	( 4,212,000)	( 6,475,000)
Payment of deferred loan costs	( 26,975)	( 3,908,243)
Cash used in financing activities	<u>( 4,238,975)</u>	<u>(10,383,243)</u>
Net increase (decrease) in cash and cash equivalents	3,034,233	( 799)
Cash and cash equivalents at beginning of year	<u>4,172,515</u>	<u>4,173,314</u>
Cash and cash equivalents at end of year	<u>\$ 7,206,748</u>	<u>\$ 4,172,515</u>
<b>Supplemental disclosures of cash flow information:</b>		
Cash paid during the year for interest	<u>\$ 8,541,257</u>	<u>\$ 11,916,319</u>

