



LINCOLN TELEPHONE COMPANY, INC.

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PUBLIC SERVICE  
COMMISSION

August 27, 2014

Chairman Bill Gallagher  
Montana Public Service Commission  
P.O. Box 202601  
Helena, MT 59620-2601

Re: Request for Waiver of Requirement to file Annual Reports by Small Telephone Companies

Dear Chairman Gallagher:

As you are well aware, the volume of paperwork imposed by government agencies on small companies can inflict a crushing burden, add extensive costs, and divert staff resources away from customer service. While the flow of necessary information to regulatory agencies is important, there is a particular concern about unnecessary and costly filings, when information required is already available to an agency. Simply reformatting that information into a unique filing is hard to justify. I hope you agree.

Sec. 38.5.2602, ARM, requires utilities to file an annual report with your agency consistent with Sec. 69-3-203, MCA. Subsection (2) of that statute requires the reports to be in the form prescribed by the commission. The commission is also authorized to request information not in the report but that is needed by the agency.

The purpose of this letter is to ask that the PSC determine that annual reports will not be required from small telephone companies doing business in Montana (companies with less than 12,000 subscribers—69-3-901(5)). In essence, we request that the PSC vote that the form prescribed for small telcos is "none". Or, in the alternative, we ask that your agency determine that the FCC Form 481 filed with the PSC satisfies the state reporting requirement.

Another reason for this request is that the FCC Form 481 is comprehensive and less discriminatory, as it applies to all ETCs. Only a fraction of small telcos are required to file the PSC annual report, although all of the telcos file the Form 481. To the extent the Commission is interested in comparisons across the industry, the Form 481 is the only report that permits that type of analysis.

We believe, and hope you will agree, that this is a chance to reduce the burden of government on small employers and to eliminate waste.

Larry Mason of Southern Montana Telephone Co. fully supports this request.

Very truly yours,

Ken Lumpkin  
General Manager

**Cc: Commission Bushman  
Commissioner Lake  
Commissioner Kavulla  
Commissioner Koopman  
Gary Duncan  
Larry Mason  
Jay Wilson Preston  
Chuck Evilsizer  
Geoff Feiss  
Bonnie Lorang**