



MOSSADAMS

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June 15, 2018

State of Washington
Utilities and Transportation Commission
P. O. Box 47250
Olympia, WA 98504-7250

Received

Records Management

06/15/2018 3:33PM

State of WASH.
UTIL. AND TRANSP.
COMMISSION

RE: Docket UT-180003
WC Docket No. 10-90: Administration of Connect America Fund Inter-carrier Compensation Replacement §54.304(d)(1), Annual Reporting Requirements §54.313(h)(i), Transition of Carrier Access Charges §51.909, and Eligible Revenue Recovery § 57.917(d)(vii)

Moss Adams LLP respectfully files with the Washington Utilities and Transportation Commission this Request for Confidential Treatment of Information (the "Request") on behalf of Pend Oreille Telephone Company. The Request seeks confidential treatment of certain financial and subscriber information contained in its filings that include the projected eligibility for CAF ICC funding for July 1, 2018 through June 30, 2019, Tariff Review Plan (TRP) data governing the local switched access rates and Local Rate Floor Data. This request is made pursuant to WAC 480-07-160.

Pursuant to 47 C.F.R. §54.304(d)(1) of the Federal Communications Commission's rules, enclosed please find the projected eligibility for CAF ICC funding for July 1, 2018 through June 30, 2019 for Pend Oreille Telephone Company, Study Area Code 522418. This projection includes any true-ups associated with earlier filing periods. This projection has also been filed with the Federal Communications Commission and the Universal Service Administrative Company, as the administrator of the Federal Universal Service Fund.

Pend Oreille Telephone Company is an A-CAM support recipient; therefore, Pend Oreille Telephone Company is not subject to the Rate Floor Data Collection as required in 47 C.F.R. §54.313 (h)(i). As previously filed in accordance with 47 C.F.R. §51.909 governing Carrier Access Charges; Pend Oreille Telephone Company provides supplemental TRP data. Lastly copies of annual certifications regarding CAF ICC Data reported to the Federal Communications Commission specifically required for Double Recovery as specified in 47 C.F.R. §57.917 (d)(vii) are included with this filing.

Following this filing will be an original printed on yellow-colored paper stamped "Confidential per WAC 480-07-160," which has been placed in a sealed envelope, along with one redacted copy. This information, submitted in a sealed envelope, stamped confidential can be reviewed by the Commission staff. Native files are not available for this compliance filing.

Public disclosure of such information would likely cause substantial harm to the financial position of the Company.



MOSSADAMS

Should you have any questions regarding this filing, please contact me.

Sincerely,

Tym Rutkowski

Senior Manager

(509) 777-0137

tym.rutkowski@mossadams.com

Enclosures

cc: Mr. Mark Mantall (Via-Email)
Ms. Susan Case (Via-Email)

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2018 CAF ICC Data Collection

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Logged in User: Samantha Simatos



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Study Area: **PEND OREILLE TELEPHONE COMPANY (ID: 522418)**
 Holding Company: **RURAL TELEPHONE CO. (ID: 200000256)**

Intrastate Revenues (FCC TRP exhibit)

- Option 1: View TRP Output in Excel
- Option 2: Download TRP Data in Excel

Intrastate Revenues

Test Year 2018-2019 Expected Maximum Intrastate Revenue: [REDACTED]

Col D -- Rate Element Description	Col E -- Unit of Demand	Col F -- 7/1/2018 Interstate Rate	Col G -- Test Year 2017-2018 Current Intrastate Rate	Col H -- 7/1/2018 Proposed Intrastate Rate	Col I -- FY 2011 Intrastate Units: Terminating for Non-Dedicated or Originating and Terminating for Dedicated Elements	Col J -- H*1 Intrastate Price-out with 7/1/2018 proposed intrastate rate and FY2011 Demand	Col K -- FY 2017 Intrastate Units: Terminating for Non-Dedicated and total for Dedicated Elements	Col L -- Test Year 2018-2019 Forecasted Intrastate Units	Col M -- [(L/K)^ (12/21)-1] *100 Intrastate Units Growth Rate %	Col N -- H*L TY 2018-19 Forecasted Intrastate Revenue
Terminating End Office Access Service Terminating End Office, Premium, per access minute	MOU	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Terminating End Office Access Service Terminating End Office, Non-Premium, per access minute	MOU	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Entrance Facility, Per Termination Voice Grade Two Wire	Termination	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Entrance Facility, Per Termination Voice Grade Four Wire	Termination	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Entrance Facility, Per Termination High Capacity DS1	Termination	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Entrance Facility, Per Termination High Capacity DS3	Termination	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Entrance Facility, Per Termination Synchronous Optical Channel OC3	Termination	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Entrance Facility, Per Termination Synchronous Optical Channel OC12	Termination	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Entrance Facility, Per Termination ESALT 2 Mbps	Circuit	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Entrance Facility, Per Termination ESALT 10 Mbps	Circuit	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Entrance Facility, Per Termination ESALT 50 Mbps	Circuit	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Direct Trunked Transport Facility/ Mile Voice Grade - Two Wire & Four Wire	Mile	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Direct Trunked Transport Facility/ Mile High Capacity DS1	Mile	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Direct Trunked Transport Facility/ Mile High Capacity DS3	Mile	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Direct Trunked Transport Facility/ Mile Synchronous Optical Channel OC3	Mile	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Direct Trunked Transport Facility/ Mile Synchronous Optical Channel OC12	Mile	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Direct Trunked Transport Facility/ Mile ESALT 2 Mbps DTF-E1	Circuit Miles	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Direct Trunked Transport Facility/ Mile ESALT 2 Mbps DTF-E2	Circuit Miles	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Direct Trunked Transport Facility/ Mile ESALT 2 Mbps DTF-E3	Circuit Miles	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Direct Trunked Transport Facility/ Mile ESALT 2 Mbps DTF-E4	Circuit Miles	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Direct Trunked Transport Facility/ Mile ESALT 10 Mbps DTF-E1	Circuit Miles	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

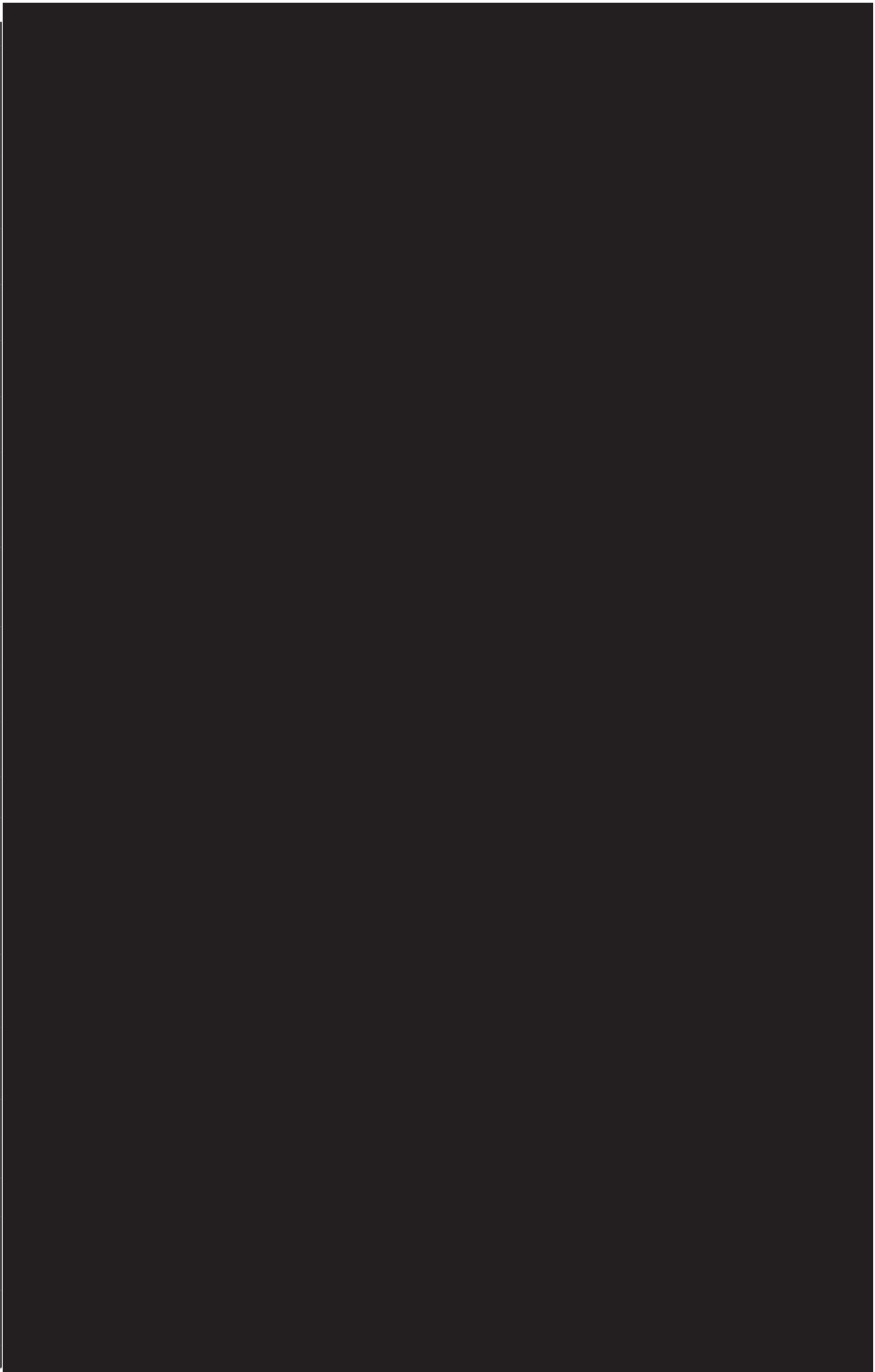
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Direct Trunked Transport Facility/ Mile ESALT 10 Mbps DTF-E2	Circuit Miles
Direct Trunked Transport Facility/ Mile ESALT 10 Mbps DTF-E3	Circuit Miles
Direct Trunked Transport Facility/ Mile ESALT 10 Mbps DTF-E4	Circuit Miles
Direct Trunked Transport Facility/ Mile ESALT 50 Mbps DTF-E1	Circuit Miles
Direct Trunked Transport Facility/ Mile ESALT 50 Mbps DTF-E2	Circuit Miles
Direct Trunked Transport Facility/ Mile ESALT 50 Mbps DTF-E3	Circuit Miles
Direct Trunked Transport Facility/ Mile ESALT 50 Mbps DTF-E4	Circuit Miles
Direct Trunked Transport Facility/Termination Voice Grade - Two Wire & Four Wire	Termination
Direct Trunked Transport Facility/Termination High Capacity DS1	Termination
Direct Trunked Transport Facility/Termination High Capacity DS3	Termination
Direct Trunked Transport Facility/Termination Synchronous Optical Channel OC3	Termination
Direct Trunked Transport Facility/Termination Synchronous Optical Channel OC12	Termination
Direct Trunked Transport Facility/Termination ESALT 2 Mbps	Circuit terms
Direct Trunked Transport Facility/Termination ESALT 10 Mbps	Circuit terms
Direct Trunked Transport Facility/Termination ESALT 50 Mbps	Circuit terms
Multiplexing, Per Arrangement DS3 to DS1	Termination
Multiplexing, Per Arrangement DS1 to Voice	Termination
Customer Node Per Node OC3 155.52 Mbps	Port
Customer Node Per Node OC12 622.08 Mbps	Port
Customer Premises Port, Per Port OC3 155.52 Mbps	Port
Customer Premises Port, Per Port STS-1 51.84 Mbps	Port
Customer Premises Port, Per Port DS3 44.736 Mbps	Port
Customer Premises Port, Per Port DS1 1.544 Mbps	Port
Add/Drop Multiplexing Central Office Port, Per Port DS1 1.544 Mbps	Port
Add/Drop Multiplexing Central Office Port, Per Port OC3 155.52 Mbps	Port
Add/Drop Multiplexing Central Office Port, Per Port DS3 44.736 Mbps	Port
Network Blocking, Per Blocked Call Network Blocking, Per Blocked Call, Applies to FGD only	Call
ESALT Real Time CoS/QoS, Per ESALT DTF-E1 Facility ESALT 2 Mbps	Facility
ESALT Real Time CoS/QoS, Per ESALT DTF-E1 Facility ESALT 10 Mbps	Facility
ESALT Real Time CoS/QoS, Per ESALT DTF-E1 Facility ESALT 50 Mbps	Facility
ESALT Entrance Facility Protection, Per ESALT Entrance Facility ESALT 2 Mbps	Circuit
ESALT Entrance Facility Protection, Per ESALT Entrance	Circuit



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Facility ESALT 10 Mbps	
ESALT Entrance Facility Protection, Per ESALT Entrance Facility ESALT 50 Mbps	Circuit
Common Channel Signaling Network Connection Signaling Mileage Facility, Per Mile	Mile
Common Channel Signaling Network Connection Signaling Mileage Termination, Per Termination	Termination
Common Channel Signaling Network Connection Signaling Entrance Facility, Per Facility	Facility
Common Channel Signaling Network Connection STP Port, Per Port	Port
Terminating Tandem Switched Transport Terminating Tandem Switched Transport Facility	Minutes / Mile
Terminating Tandem Switched Transport Terminating Tandem Switched Termination	Minutes
Terminating Tandem Switched Transport Terminating Tandem Switching	Minutes
Nonrecurring Charges Voice Grade Two Wire	Facility
Nonrecurring Charges Voice Grade Four Wire	Facility
Nonrecurring Charges High Capacity DS1	Facility
Nonrecurring Charges High Capacity DS3	Facility
Nonrecurring Charges Synchronous Optical Channel OC3	Facility
Nonrecurring Charges Synchronous Optical Channel OC12	Facility
Nonrecurring Charges Interim NXX Translation, Per Order	Order
Nonrecurring Charges FGC and FGD Conversion of Multifrequency Address Signaling to SS7 Signaling or SS7 Signaling to Multifrequency Address Signaling, per 24 trunks converted or fraction thereof on a per order basis	Order
Nonrecurring Charges Trunk Activation, per 24 trunks activated or fraction thereof on a per order basis	Order
Nonrecurring Charges Flexible Automatic Number Identification (Flex ANI), per End Office, per CIC	End Office
Nonrecurring Charges ESALT 2 Mbps	Facility
Nonrecurring Charges ESALT 10 Mbps	Facility
Nonrecurring Charges ESALT 50 Mbps	Facility
Nonrecurring Charges ESALT Direct Trunked Termination, per ESALT Direct Trunked Termination installed	Order
Nonrecurring Charges ESALT Entrance Facility Protection, per ESALT Entrance Facility	Facility



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Study Area: PEND OREILLE TELEPHONE COMPANY (ID: 522418)
Holding Company: RURAL TELEPHONE CO. (ID: 20000256)

CONNECT AMERICA FUND

[Data to be provided to USAC/FCC in June 2018 for CAF ICC Purposes]

Settlement Type: Cost

Test Period 7/1/18-6/30/19 Post True-up (Filing)

View

Rate-of-Return (ROR) Carrier Revenue Requirement	
1	2011 Interstate Switched Access Revenue Requirement
2	FY 2011 Intrastate Terminating Switched Access Revenues
3	FY 2011 Net Reciprocal Compensation Revenues
4	2011 ROR Carrier Base Period Revenue (Line 1 + Line 2 + Line 3)
5	ROR Carrier Baseline Adjustment Factor (0.95 ^ 7)
6	ROR Carrier Revenue Requirement (Line 4 x Line 5)
7	Pool Administration Expenses
8	Total ROR Carrier Revenue Requirement (Line 6 + Line 7)
Revenues from Reformed Inter-carrier Compensation (ICC) Rates	
9	Interstate Switched Access Revenues
10	Interstate Allocated Switched Access Revenues#
11	Transitional Intrastate Access Service Revenues
12	Net Transitional Reciprocal Compensation Revenues
13	Total ICC Revenue (Line 10 + Line 11 + Line 12)
Eligible Recovery	
14	TRS Increment
15	Regulatory Fees Increment
16	NANPA Increment
17	Interstate Local Switching Support for Price Cap Affiliates or Estimated Duplicate LSS Costs in CAF II
18	Adjustment for Double Recovery or Corrections
19	Test Period 16/17 Trueup - Net Impact on Total Eligible Recovery
20	Eligible Recovery (Line 8 - Line 13) + (Line 14 + Line 15 + Line 16 + Line 18 + Line 19) - (Line 17)
Revenues from Access Recovery Charges (ARC)	
21	Residential ARC Revenues
22	Single Line Business ARC Revenues
23	Multi-Line Business ARC Revenues
24	Total ARC Revenues (Line 21 + Line 22 + Line 23)
Connect America Fund (CAF) ICC Support**	
25	Connect America Fund (CAF) ICC Support (Line 20 - Line 24)
Revised CAF ICC Support with Imputed ARC Revenues for Broadband-Only Lo	

REDACTED

26	ARC Revenue Adjustment following "Second Order on Reconsideration & Clarification" FCC 18-13
27	Adjusted Test Period 2018-2019 CAFICC Support (Line 25 - Line 26)



NOTES:

#Per FCC Designation Order, calculated as (Sum of Line 9 for all TS pool participants) * (Line 1/ Sum of Line 1 for all TS pool participants)

**NECA estimate provided for informational purposes only - actual to be calculated by USAC.

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2018 CAF ICC Data Collection

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Study Area: PEND OREILLE TELEPHONE COMPANY (ID: 522418)
Holding Company: RURAL TELEPHONE CO. (ID: 200000256)

Access Recovery Charges

Recalculate ARC Rates & CAF Support revenues

Test Period 2018-19 Pre-True-up View Test Period 2018-19 Post-True-Up (Filing) View

Test Period 2018-2019 Post True-Up (Filing) View

Table with 11 columns: Exchange/Zone Name, Residential Lines excluding Lifelines, Residential ARC, Residential ARC Revenue, SLB Lines, SLB ARC, SLB ARC Revenue, MLB Lines, MLB ARC, MLB ARC Revenue, Total ARC Revenue. The data row is redacted with a black box.

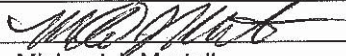
TO BE COMPLETED BY THE REPORTING CARRIER,

Certification of Officer as to the Accuracy of the CAF ICC Data Reported

I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the actual data reported; and, to the best of my knowledge, the information reported on this form is accurate.

Name of Reporting Carrier **Pend Oreille Telephone Company**

Signature of Authorized Officer



Date **05/30/18**

Printed name of Authorized Officer

Michael J. Martell

Title or position of Authorized Officer

Vice-President

Telephone number of Authorized Officer:

(208) 366-2614, ext.

Study Area Code of Reporting Carrier

522418

Filing Due Date for this form
(mm/dd/yyyy)

6/18/2018

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 REPORTING CARRIER, IF AN AGENT IS FILING DATA ON THE CARRIER'S BEHALF:

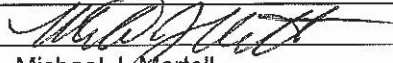
Certification of Officer to Authorize an Agent to File Data Reported on Behalf of Reporting Carrier

I certify that (Name of Agent) National Exchange Carrier Association, Inc. (NECA) 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 data provided to the Authorized Agent; and, to the best of my knowledge, the actual data provided to the Authorized Agent are accurate.

Name of Authorized Agent National Exchange Carrier Association, Inc. (NECA)

Name of Reporting Carrier Pend Oreille Telephone Company

Signature of Authorized Officer



Date 05/30/18

Printed name of Authorized Officer: Michael J. Martell

Title or position of Authorized Officer: Vice-President

Telephone number of Authorized Officer: (208) 366-2614, ext.

Study Area Code of Reporting Carrier 522418

Filing Due Date for this form
(mm/dd/yyyy)


6/18/2018

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

Certification of Officer for Rate-of-Return Carrier Eligibility for CAF/ICC Recovery

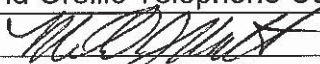
I certify that I am an officer of the reporting carrier and that, to the best of my knowledge, the reporting carrier on this form certifies that it has complied with Eligible Recovery §51.917(d) and Access Recovery Charge §51.917(e) and is eligible to receive the CAF/ICC support requested pursuant to §51.917(f).

Name of Reporting Carrier				Pend Oreille Telephone Company	
Signature of authorized officer				Date	05/30/18
Printed name of authorized officer		Michael J. Martell			
Title or position of authorized officer		Vice-President			
Telephone number of authorized officer:		(208) 366-2614			
Study Area Code of Reporting Carrier	522418	Filing Due Date for this form (mm/dd/yyyy)	6/18/2018		
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

Certification of Officer for Rate-of-Return Carrier Not Seeking Duplicative Recovery

I certify that I am an officer of the reporting carrier and that, to the best of my knowledge, this reporting carrier is not seeking duplicative recovery in the state jurisdiction for any Eligible Recovery subject to the recovery mechanism as per 51.917(d)(vii).

Name of Reporting Carrier				Pend Oreille Telephone Company	
Signature of authorized officer				Date	05/30/18
Printed name of authorized officer		Michael J. Martell			
Title or position of authorized officer		Vice-President			
Telephone number of authorized officer:		(208) 366-2614 ext.			
Study Area Code of Reporting Carrier	522418	Filing Due Date for this form (mm/dd/yyyy)	6/18/2018		
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.					