



MOSSADAMS

June 16, 2021

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601 W. Riverside Avenue
Suite 1800
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State of Washington
Utilities and Transportation Commission
P. O. Box 47250
Olympia, WA 98504-7250

RE: Docket UT-210003
WC Docket No. 10-90: Administration of Connect America Fund Intercarrier Compensation Replacement §54.304(d)(1), 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, 2021 through June 30, 2022, and Tariff Review Plan (TRP) data governing the local switched access rates. Public disclosure of such information would likely cause substantial harm to the financial position of the Company. 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, 2021 through June 30, 2022 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.

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.

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 Martell (via-email)
Ms. Susan Case (via-email)



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



Intrastate Revenues (FCC TRP exhibit)

[Download TRP Data in Excel](#)

Intrastate Revenues

[View TRP report in Excel](#)

Test Year 2021-2022 Expected Maximum Intrastate

Col D --	Col E --	Col F --	Col G --	Col H --	Col I --	Col J H*1	Col K --	Col L --	Col M [(L/K)*(12/21)-1]*100	Col N H*L
Rate Element Description	Unit of Demand	7/1/2021 Interstate Rate	Test Year 2020- 2021 Current Intrastate Rate	7/1/2021 Proposed Intrastate Rate	FY 2011 Intrastate Units Terminating for Non-Dedicated or Originating and Terminating for Dedicated Elements	Intrastate Price-out with 7/1/2021 proposed intrastate rate and FY2011 Demand	FY 2020 Intrastate Units Terminating for Non-Dedicated and total for Dedicated Elements	Test Year 2021- 2022 Forecasted Intrastate Units	Intrastate Units Growth Rate %	TY 2021-22 Forecasted Intrastate Revenue
Terminating End Office Access Service Terminating End Office Premium per access minute	MOU	\$0.00000000	\$0.00000000	\$0.00000000						
Terminating End Office Access Service Terminating End Office Non-Premium per access minute	MOU	\$0.00000000	\$0.00000000	\$0.00000000						
Entrance Facility Per Termination Voice Grade Two Wire	Termination	\$33.63	\$33.63	\$33.63						
Entrance Facility Per Termination Voice Grade Four Wire	Termination	\$53.81	\$53.81	\$53.81						
Entrance Facility Per Termination High Capacity DS1	Termination	\$163.91	\$163.91	\$163.91						
Entrance Facility Per Termination High Capacity DS3	Termination	\$1 496.50	\$1 496.50	\$1 496.50						
Entrance Facility Per Termination Synchronous Optical Channel OC3	Termination	\$1 526.00	\$1 526.00	\$1 526.00						
Entrance Facility Per Termination Synchronous Optical Channel OC12	Termination	\$1 629.27	\$1 629.27	\$1 629.27						
Entrance Facility Per Termination ESALT 2 Mbps	Circuit	\$290.30	\$290.30	\$290.30						
Entrance Facility Per Termination ESALT 10 Mbps	Circuit	\$312.89	\$312.89	\$312.89						
Entrance Facility Per Termination ESALT 50 Mbps	Circuit	\$405.37	\$405.37	\$405.37						
Direct Trunked Transport Facility/ Mile Voice Grade - Two Wire & Four Wire	Mile	\$2.39	\$2.39	\$2.39						
Direct Trunked Transport Facility/ Mile High Capacity DS1	Mile	\$11.25	\$11.25	\$11.25						
Direct Trunked Transport Facility/ Mile High Capacity DS3	Mile	\$97.82	\$97.82	\$97.82						
Direct Trunked Transport Facility/ Mile Synchronous Optical Channel OC3	Mile	\$104.71	\$104.71	\$104.71						
Direct Trunked Transport Facility/ Mile Synchronous Optical Channel OC12	Mile	\$131.42	\$131.42	\$131.42						
Direct Trunked Transport Facility/ Mile ESALT 2 Mbps DTF-E1	Circuit Miles	\$33.06	\$33.06	\$33.06						
Direct Trunked Transport Facility/ Mile ESALT 2 Mbps DTF-E2	Circuit Miles	\$22.07	\$22.07	\$22.07						
Direct Trunked Transport Facility/ Mile ESALT 2 Mbps DTF-E3	Circuit Miles	\$79.58	\$79.58	\$79.58						
Direct Trunked Transport Facility/ Mile ESALT 2 Mbps DTF-E4	Circuit Miles	\$133.24	\$133.24	\$133.24						
Direct Trunked Transport Facility/ Mile ESALT 10 Mbps DTF-E1	Circuit Miles	\$83.85	\$83.85	\$83.85						
Direct Trunked Transport Facility/ Mile ESALT 10 Mbps DTF-E2	Circuit Miles	\$50.32	\$50.32	\$50.32						
Direct Trunked Transport Facility/ Mile ESALT 10 Mbps DTF-E3	Circuit Miles	\$200.30	\$200.30	\$200.30						
Direct Trunked Transport Facility/ Mile ESALT 10 Mbps DTF-E4	Circuit Miles	\$410.84	\$410.84	\$410.84						
Direct Trunked Transport Facility/ Mile ESALT 50 Mbps DTF-E1	Circuit Miles	\$234.82	\$234.82	\$234.82						
Direct Trunked Transport Facility/ Mile ESALT 50 Mbps DTF-E2	Circuit Miles	\$156.54	\$156.54	\$156.54						
Direct Trunked Transport Facility/ Mile ESALT 50 Mbps DTF-E3	Circuit Miles	\$654.18	\$654.18	\$654.18						
Direct Trunked Transport Facility/ Mile ESALT 50 Mbps DTF-E4	Circuit Miles	\$1 165.85	\$1 165.85	\$1 165.85						
Direct Trunked Transport Facility/Termination Voice Grade - Two Wire & Four Wire	Termination	\$24.05	\$24.05	\$24.05						
Direct Trunked Transport Facility/Termination High Capacity DS1	Termination	\$58.27	\$58.27	\$58.27						
Direct Trunked Transport Facility/Termination High Capacity DS3	Termination	\$374.11	\$374.11	\$374.11						
Direct Trunked Transport Facility/Termination Synchronous Optical Channel OC3	Termination	\$389.54	\$389.54	\$389.54						
Direct Trunked Transport Facility/Termination Synchronous Optical Channel OC12	Termination	\$848.14	\$848.14	\$848.14						
Direct Trunked Transport Facility/Termination ESALT 2 Mbps	Circuit terms	\$77.17	\$77.17	\$77.17						
Direct Trunked Transport Facility/Termination ESALT 10 Mbps	Circuit terms	\$94.34	\$94.34	\$94.34						
Direct Trunked Transport Facility/Termination ESALT 50 Mbps	Circuit terms	\$115.32	\$115.32	\$115.32						
Multiplexing Per Arrangement DS3 to DS1	Termination	\$341.34	\$341.34	\$341.34						
Multiplexing Per Arrangement DS1 to Voice	Termination	\$131.79	\$131.79	\$131.79						
Customer Node Per Node OC3 155.52 Mbps	Port	\$354.34	\$354.34	\$354.34						
Customer Node Per Node OC12 622.08 Mbps	Port	\$1 023.66	\$1 023.66	\$1 023.66						
Customer Premises Port Per Port OC3 155.52 Mbps	Port	\$116.28	\$116.28	\$116.28						
Customer Premises Port Per Port STS-1 51.84 Mbps	Port	\$139.61	\$139.61	\$139.61						
Customer Premises Port Per Port DS3 44.736 Mbps	Port	\$139.61	\$139.61	\$139.61						
Customer Premises Port Per Port DS1 1.544 Mbps	Port	\$35.78	\$35.78	\$35.78						
Add/Drop Multiplexing Central Office Port Per Port DS1 1.544 Mbps	Port	\$28.63	\$28.63	\$28.63						
Add/Drop Multiplexing Central Office Port Per Port OC3 155.52 Mbps	Port	\$116.28	\$116.28	\$116.28						
Add/Drop Multiplexing Central Office Port Per Port DS3 44.736 Mbps	Port	\$71.58	\$71.58	\$71.58						
Network Blocking Per Blocked Call Network Blocking Per Blocked Call Applies to FGD only	Call	\$0.01640000	\$0.01640000	\$0.01640000						
ESALT Real Time CoS/QoS Per ESALT DTF-E1 Facility ESALT 2 Mbps	Facility	\$6.31	\$6.31	\$6.31						
ESALT Real Time CoS/QoS Per ESALT DTF-E1 Facility ESALT 10 Mbps	Facility	\$31.59	\$31.59	\$31.59						
ESALT Real Time CoS/QoS Per ESALT DTF-E1 Facility ESALT 50 Mbps	Facility	\$98.24	\$98.24	\$98.24						
ESALT Entrance Facility Protection Per ESALT Entrance Facility ESALT 2 Mbps	Circuit	\$284.10	\$284.10	\$284.10						
ESALT Entrance Facility Protection Per ESALT Entrance Facility ESALT 10 Mbps	Circuit	\$284.10	\$284.10	\$284.10						
ESALT Entrance Facility Protection Per ESALT Entrance Facility ESALT 50 Mbps	Circuit	\$284.10	\$284.10	\$284.10						
Common Channel Signaling Network Connection Signaling Mileage Facility Per Mile	Mile	\$3.24	\$3.24	\$3.24						
Common Channel Signaling Network Connection Signaling Mileage Termination Per Termination	Termination	\$32.38	\$32.38	\$32.38						
Common Channel Signaling Network Connection Signaling Entrance Facility Per Facility	Facility	\$62.05	\$62.05	\$62.05						
Common Channel Signaling Network Connection STP Port Per Port	Port	\$319.73	\$319.73	\$319.73						
Terminating Tandem Switched Transport Terminating Tandem Switched Transport Facility	Minutes / Mile	\$0.00043000	\$0.00043000	\$0.00043000						

Terminating Tandem Switched Transport Terminating Tandem Switched Termination	Minutes	\$0.00223300	\$0.00223300	\$0.00223300
Terminating Tandem Switched Transport Terminating Tandem Switching	Minutes	\$0.00563300	\$0.00563300	\$0.00563300
Nonrecurring Charges Voice Grade Two Wire	Facility	\$480.90	\$480.90	\$480.90
Nonrecurring Charges Voice Grade Four Wire	Facility	\$480.90	\$480.90	\$480.90
Nonrecurring Charges High Capacity DS1	Facility	\$352.68	\$352.68	\$352.68
Nonrecurring Charges High Capacity DS3	Facility	\$475.56	\$475.56	\$475.56
Nonrecurring Charges Synchronous Optical Channel OC3	Facility	\$384.72	\$384.72	\$384.72
Nonrecurring Charges Synchronous Optical Channel OC12	Facility	\$384.72	\$384.72	\$384.72
Nonrecurring Charges Interim NXX Translation Per Order	Order	\$235.11	\$235.11	\$235.11
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	\$472.35	\$472.35	\$472.35
Nonrecurring Charges Trunk Activation per 24 trunks activated or fraction thereof on a per order basis	Order	\$490.51	\$490.51	\$490.51
Nonrecurring Charges Flexible Automatic Number Identification (Flex ANI) per End Office per CIC	End Office	\$0.00000000	\$0.00000000	\$0.00000000
Nonrecurring Charges ESALT 2 Mbps	Facility	\$569.95	\$569.95	\$569.95
Nonrecurring Charges ESALT 10 Mbps	Facility	\$569.95	\$569.95	\$569.95
Nonrecurring Charges ESALT 50 Mbps	Facility	\$569.95	\$569.95	\$569.95
Nonrecurring Charges ESALT Direct Trunked Termination per ESALT Direct Trunked Termination installed	Order	\$375.50	\$375.50	\$375.50
Nonrecurring Charges ESALT Entrance Facility Protection per ESALT Entrance Facility	Facility	\$576.11	\$576.11	\$576.11

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Study Area: PEND OREILLE TELEPHONE COMPANY (ID: 522418)



Study Area USAC Reports

[[View printer-friendly report](#)]

2021 USAC Data Report (Test Period 2021-2022) ▼

CONNECT AMERICA FUND

[Data to be provided to USAC/FCC in June 2021 for CAF ICC Purposes]

Settlement Type: Cost

Test Period 7/1/21-6/30/22 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 ^ 10)
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 19/20 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 Loops	
26	ARC Revenue Adjustment following "Second Order on Reconsideration & Clarification" FCC 18-13
27	Adjusted Test Period 2021-2022 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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Study Area: PEND OREILLE TELEPHONE COMPANY (ID: 522418)



Access Recovery Charges

Recalculate ARC Rates & CAF Support revenues

Test Period 2021-22 Pre-True-up View		Test Period 2021-22 Post-True-Up (Filing) View								
Test Period 2021-2022 Post True-Up (Filing) View										
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
Cusick										
Ione										
Metairie Falls										
Study Area Summary										

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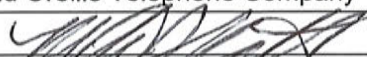
TO BE COMPLETED BY THE REPORTING CARRIER,

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 **05/24/2021**

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)

June 16 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 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 05/24/2021

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	<u>522418</u>	Filing Due Date for this form (mm/dd/yyyy)	<u>June 16 2021</u>
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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		05/24/2021
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)	June16 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 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 **05/24/2021**

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) **June 16 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.