Records Management

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601 W. Riverside Avenue

Received

Jun 17, 2024

Spokane, WA 99201



June 17, 2024

Jeff Killip
Executive Director and Secretary
State of Washington
Utilities and Transportation Commission
P. O. Box 47250

Olympia, WA 98504-7250

RE: Docket UT-240014

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 The Toledo Telephone Company, Inc. 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, 2024 through June 30, 2025, 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, 2024 through June 30, 2025 for The Toledo Telephone Company, Inc., Study Area Code 522447. 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; The Toledo Telephone Company, Inc. 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. Phillip G. Cappalonga (via email)

CAF ICC Data Collection USAC Form



Study Area: TOLEDO TELEPHONE COMPANY INC. (ID: 522447)

Settlement Type: Cost

CONNECT AMERICA FUND [Data to be provided to USAC/FCC in June 2024 for CAF ICC Purposes]

Test Period 7/2/24-6/30/25 Post True-up (Filing) View

_		Test Period 7/2/24-6/30/25 Post True-up (Filing) View
		Rate of Return (ROR) Carrier Revenue Requirement
	1	2011 Interstate witched Access Revenue Requirement
	2	FY 2011 Intrastate Terminating witched Access Revenues
		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 ^ 13)
	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 Intercarrier 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
	1	Total ICC Revenue (Line 10 + Line 11 + Line 12)
		Eligible Recovery
	14	TRS Increment
	15	Regulatory Fees Increment
	16	NANPA Increment
	17	Interstate Local witching upport for Price Cap Affiliates or Estimated Duplicate L Costs in CAF II
	18	Adjustment for Double Recovery or Corrections
	19	Test Period 22/2 Trueup Net Impact on Total Eligible Recovery
	20	Eligible Recovery (Line 8 Line 1) + (Line 14 + Line 15 + Line 16 + Line 18 + Line 19) (Line 17)
		Revenues from Access Recovery Charges (ARC)
	21	Residential ARC Revenues
	22	ingle Line Business ARC Revenues
	2	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 upport (Line 20 Line 24)
		Revised CAF ICC Support with Imputed ARC Revenues for Broadband-Only Loops
	26	Imputed ARC revenue for broadband-only loops
	27	Adjusted Test Period 2024 2025 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.

2024 CAF ICC Data Collection

Juli Charter



Study Area Selection Study Area Data Input Menu CAF & ARC Output Historic Reports Certification Instructions & Documents Contact Us

Study Area: TOLEDO TELEPHONE COMPANY INC. (ID: 522447)

Intrastate Revenues (FCC TRP exhibit)

Intrastate Revenues

Download TRP Data in Excel

View TRP report in Excel

Test Year 2024-2025 Expected Maximum Intrastate Revenu

Col D	Col E	Col F	Col G	Col H	Col I	Colj	Col K	Col L	Col M	Col N
-	-	-	-	-	-	H*I	-	-	 [(L/K)^(12/21)-1]*100	
Bata Blancat Basadada		714 (200 4	W W 00.00	711170001	FW 0044		F1/ 0000	W W 0004		W/ 0004 05
Rate Element Description	Unit of Demand	7/1/2024 Interstate Rate	Test Year 2023- 2024 Current	7/1/2024 Proposed	FY 2011 Intrastate Units	Intrastate Price-out with	FY 2023 Intrastate Units	Test Year 2024- 2025 Forecaster	Intrastate Units Growth Rate %	TY 2024-25 Forecasted
					Terminating for			Intrastate Units	0.0101111111111111111111111111111111111	Intrastate
					Non-Dedicated	proposed	Non-Dedicated			Revenue
					or Originating	intrastate rate				
					and Terminating for Dedicated	and FY2011 Demand	Dedicated Elements			
					101 Dedicated	Demanu	Elements			
erminating End Office Access Service Terminating End Office, Premium, per access minute	мои	\$0.00000000	\$0.00000000	\$0.0000000	0					
arminating End Office Access Service Terminating End Office Non-	мои	\$0.00000000	\$0.00000000	\$0.0000000						
remium, per access minute										
•	Termination	\$84.92								
	Termination Termination	\$135.89 \$413.99								
	Termination	\$3,780.03								
	Termination	\$3,854.49								
	Termination	\$4,115.34								
	Circuit	\$733.25								
intrance Facility, Per Termination ESALT 10 Mbps	Circuit	\$790.30	\$771.08	\$790.3	0					
ntrance Facility, Per Termination ESALT 50 Mbps	Circuit	\$1,023.89	\$998.99	\$1,023.8	9					
Direct Trunked Transport Facility/ Mile Voice Grade - Two Wire & Four Wir		\$6.03								
,	Mile	\$28.38			4					
	Mile	\$247.07								
Direct Trunked Transport Facility/ Mile Synchronous Optical Channel OC3		\$264.49								
Direct Trunked Transport Facility/ Mile Synchronous Optical Channel OC1:		\$331.97								
	Circuit Miles Circuit Miles	\$83.54 \$55.70		\$83.5 \$55.7						
	Circuit Miles Circuit Miles	\$55.70 \$82.95								
	Circuit Miles	\$138.88								
	Circuit Miles	\$211.83								
	Circuit Miles	\$127.12								
	Circuit Miles	\$208.79	\$203.71	\$208.7	9					
Direct Trunked Transport Facility/ Mile ESALT 10 Mbps DTF-E4	Circuit Miles	\$428.23	\$417.82	\$428.2	3					
Direct Trunked Transport Facility/ Mile ESALT 50 Mbps DTF E1	Circuit Miles	\$593.12	\$578.70	\$593.1	2					
	Circuit Miles	\$395.44								
	Circuit Miles	\$681.88			4					
Direct Trunked Transport Facility/ Mile ESALT 50 Mbps DTF-E4 Direct Trunked Transport Facility/Termination Voice Grade Two Wire &	Circuit Miles	\$1,215.21	\$1,185.66	\$1,215,2	1					
our Wire	Termination	\$60.79	\$59.31	\$60.7	9					
	Termination	\$147.15								
Direct Trunked Transport Facility/Termination Synchronous Ontical	Termination	\$945.00								
hannel OC3	Termination	\$983.92	\$960.00	\$983.9	2					
Direct Trunked Transport Facility/Termination Synchronous Optical Channel OC12	Termination	\$2,142.30	\$2,090.21	\$2,142.3	o					
	Circuit terms	\$194.94	\$190.20	\$194.9	4					
Direct Trunked Transport Facility/Termination ESALT 10 Mbps	Circuit terms	\$238.32	\$232.53	\$238.3	2					
	Circuit terms	\$291.27								
	Termination	\$862.19								
	Termination	\$332.89								
	Port	\$895.02								
	Port Port	\$2,585.65 \$293.68								
	Port	\$352.60			4					
	Port	\$352.60								
	Port	\$90.39			4					
	Port	\$72,31	\$70.55	\$72.3	1					
	Port	\$293.68								
	Port	\$180.81	\$176.41	\$180.8						
Network Blocking, Per Blocked Call Network Blocking, Per Blocked Call,	Call	\$0.01710000	\$0.01667000	\$0.0171000	0					
** ** * * * *	Facility	\$15.95	\$15.56	\$15.9	5					
	Facility	\$79.77								
	Facility	\$248.25								
CALT February Feelile, Protection Des FCALT February Feelile, FCALT 2	Circuit	\$296.13	\$288.93	\$296.1	3					
SALT Entrance Facility Protection, Per ESALT Entrance Facility ESALT 10	Circuit	\$296.13	\$288.93	\$296.1	3					
NOPS SALT Entrance Facility Protection, Per ESALT Entrance Facility ESALT 50	Circuit	\$296.13								
иорs Common Channel Signaling Network Connection Signaling Mileage Facility		\$8.15								
er Mile Common Channel Signaling Network Connection Signaling Mileage	Termination	\$81.83								
ermination, Per Termination Common Channel Signaling Network Connection Signaling Entrance	Facility	\$156.73								
aciity, Per Facility	Port	\$807.63								
erminating Tandem Switched Transport Terminating Tandem Switched	Minutes / Mile	\$0.00020900								
ransport Facility erminating Tandem Switched Transport Terminating Tandem Switched	Minutes	\$0.00108900								
ermination										
erminating Tandem Switched Transport Terminating Tandem Switching	Minutes	\$0.00275100	\$0.00268400	\$0.0027510	0					

REDACTED FOR PUBLIC INSPECTION

5/20/24, 4 52 PM 2024 CAF ICC Data Collection \$501.2 \$367.6 \$495.6 Nonrecurring Charges Voice Grade Four Wire Facility \$501.26 \$489.07 Nonrecurring Charges High Capacity DS1 Nonrecurring Charges High Capacity DS3 Facility \$367.61 \$358.67 Facility \$495.69 \$483.64 Nonrecurring Charges Synchronous Optical Channel OC3 Nonrecurring Charges Synchronous Optical Channel OC12 Facility \$401.01 \$391.26 \$401.0 \$401.01 Facility Nonrecurring Charges Interim NXX Translation, Per Order Nonrecurring Charges FGC and FGD Conversion of Multifrequency Address Order \$245.07 \$239.11 \$245.0 Signaling to SS7 Signaling or SS7 Signaling to Multifrequency Address Signaling, per 24 trunks converted or fraction thereof on a per order basis \$492.35 \$480.38 \$492.3 Order Nonrecurring Charges Trunk Activation, per 24 trunks activated or fraction thereof on a per order basis

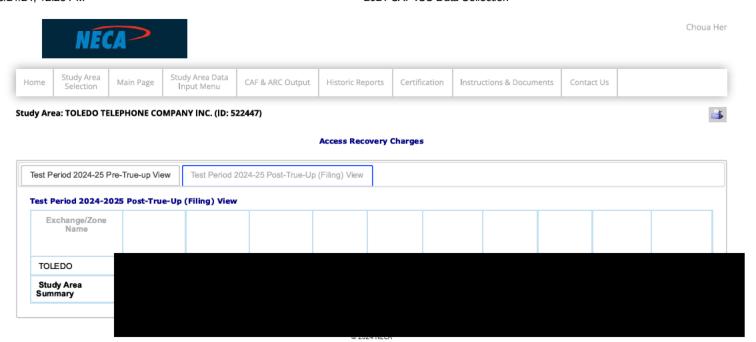
Nonrecurring Charges Trunk Activation, per 24 trunks activated or fraction thereof on a per order basis

Nonrecurring Charges Flexible Automatic Number Identification (Flex ANI), per End Office, per CIC \$511.2 \$511.28 \$498.85 \$0.00000000 \$0.0000000 \$0.00000000 Nonrecurring Charges ESALT 2 Mbps \$594.09 \$579.64 \$594.0 Nonrecurring Charges ESALT 10 Mbps Nonrecurring Charges ESALT 50 Mbps Facility \$594.09 \$579.64 \$594.0 \$594.09 \$579.64 Nonrecurring Charges ESALT Direct Trunked Termination, per ESALT Direct Trunked Termination installed \$391.40 \$381.88 \$391.4 Nonrecurring Charges ESALT Entrance Facility Protection, per ESALT Entrance Facility Facility \$600,49 \$585.89 \$600.4

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2024 CAF ICC Data Collection



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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: TOLEDO TELEPHONE COMPANY INC. Digitally signed by Philip Cappalonga DN:cn=Philip Cappalonga,email=phil@toledotel.net,O=toledo telephone **Philip Cappalonga** company inc.,I= , Date:5/30/2024 Date: 5/30/2024 Signature of Authorized Officer: Printed name of Authorized Officer: Philip Cappalonga Title or position of Authorized Officer: **Chief Financial Officer** Telephone number of Authorized Officer: 360-864-2004 Filing Due Date for this form Study Area Code of Reporting Carrier 522447 6/17/2024 (mm/dd/yyyy) 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:

Certifica	ation of Officer to Authorize	e an Agent to File D	ata Reported on Behalf	of Reporting Carrier		
I certify that (Name of Agent) the reporting carrier. I also certify tha provided to the Authorized Agent; an	at I am an officer of the reporti	ng carrier; my respon	isibilities include ensuring t		f	
Name of Authorized Agent :	National Exchange Carr	riers Association, I	nc.			
Name of Reporting Carrier:	TOLEDO TELEPHONE	COMPANY INC.				
Signature of Authorized Officer:	Philip Cappalonga		Digitally signed by Philip Cappalonga DN:cn=Philip Cappalonga,email=phil@toledotel.net,O=toledo telephone company inc.,l= , Date:5/30/2024			5/30/2024
Printed name of Authorized Officer:	F	Philip Cappalonga				
Title or position of Authorized Office	er:	Chief Financial C	Officer			
Telephone number of authorized off	ficer:	360-864-2004				
Study Area Code of Reporting Carri	ier 522447	Filing D (mm/do	Oue Date for this form	6/17/2024		
	false statements on this form 502, 503(b), or fine or impriso	•		Communications Act of 1934, 47 18 U.S.C. § 1001.	U.S.C.	

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: TOLEDO TELEPHONE COMPANY INC. Digitally signed by Philip Cappalonga DN:cn=Philip Cappalonga,email=phil@toledotel.net,O=toledo telephone **Philip Cappalonga** company inc.,I= , Date:5/30/2024 Signature of Authorized Officer or employee: 5/30/2024 Philip Cappalonga Printed name of Authorized Officer or employee: Title or position of Authorized Officer or employee: **Chief Financial Officer** Telephone number of Authorized Officer or employee: 360-864-2004 Filing Due Date for this form Study Area Code of Reporting Carrier 522447 6/17/2024 (mm/dd/yyyy) 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, the 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: TOLEDO TELEPHONE COMPANY INC. Digitally signed by Philip Cappalonga DN:cn=Philip										
Philip Cappalonga Cappalonga,email=phil@toledotel.net,O=toledo telephone company inc.,l= , Date:5/30/2024 Date: 5/30/20										
Printed name of Authorized Officer or employe	ee:	Philip Capp	alonga							
Title or position of Authorized Officer or emplo	yee:	Chief Fina	ancial Officer							
Telephone number of Authorized Officer or employee: 360-864-2004										
Study Area Code of Reporting Carrier	522447		Filing Due Date for this form (mm/dd/yyyy)	6/17/2024						
		•	shed by fine or forfeiture under the C Title 18 of the United States Code, 1		I, 47 U.S.C.					