

June 16, 2017

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

RE: WC Docket No. 10-90: Administration of Connect America Fund Intercarrier 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 on behalf of The Toledo Telephone Company, Inc. with the Washington Utilities and Transportation Commission this Request for Confidential Treatment of Information (the "Request"). 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, 2017 through June 30, 2018, 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, 2017 through June 30, 2018 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.

In addition The Toledo Telephone Company, Inc. includes its Local Rate Floor Data certifications and associated reporting 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; 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.

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.

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

Should you have any questions regarding this filing, please contact me at 509.777.0137 or [tym.rutkowski@mossadams.com](mailto:tym.rutkowski@mossadams.com).

Sincerely,

A handwritten signature in blue ink, appearing to read "Tym Rutkowski".

Tym Rutkowski, Regulatory Consulting Manager for  
Moss Adams LLP

Enclosures

cc: Mr. Phillip G. Cappalonga (Via-Email)



2017 CAF ICC Data Collection

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Study Area: TOLEDO TELEPHONE CO (ID: 522447)

Intrastate Revenues (FCC TRP exhibit)

Option 1: View TRP Output in Excel

Option 2: Download TRP Data in Excel

Intrastate Revenues

Test Year 2017-2018 Expected Maximum Intrastate Revenue: [REDACTED]

Col D --	Col E --	Col F --	Col G --	Col H --	Col I --	Col J -- H*I	Col K --	Col L --	Col M -- [[L/K]^ (12/21)-1] *100	Col N -- H*L
Rate Element Description	Unit of Demand	7/1/2017 Interstate Rate	Test Year 2016-2017 Current Intrastate Rate	7/1/2017 Proposed Intrastate Rate	FY 2011 Intrastate Units: Terminating for Non-Dedicated or Originating and Terminating for Dedicated Elements	Intrastate Price-out with 7/1/2017 proposed intrastate rate and FY2011 Demand	FY 2016 Intrastate Units: Terminating for Non-Dedicated and total for Dedicated Elements	Test Year 2017-2018 Forecasted Intrastate Units	Intrastate Units Growth Rate %	TY 2017-18 Forecasted Intrastate Revenue
Terminating End Office Access Service	MOU									
Terminating End Office, Premium, per access minute	MOU									
Terminating End Office Access Service	MOU									
Terminating End Office, Non-Premium, per access minute	MOU									
Entrance Facility, Per Termination Voice Grade Two Wire	Termination									
Entrance Facility, Per Termination Voice Grade Four Wire	Termination									
Entrance Facility, Per Termination High Capacity DS1	Termination									
Entrance Facility, Per Termination High Capacity DS3	Termination									
Entrance Facility, Per Termination Synchronous Optical Channel OC3	Termination									
Entrance Facility, Per Termination Synchronous Optical Channel OC12	Termination									
Entrance Facility, Per Termination ESALT 2 Mbps	Circuit									
Entrance Facility, Per Termination ESALT 10 Mbps	Circuit									
Entrance Facility, Per Termination ESALT 50 Mbps	Circuit									
Direct Trunked Transport Facility/ Mile Voice Grade - Two Wire & Four Wire	Mile									
Direct Trunked Transport Facility/ Mile High Capacity DS1	Mile									
Direct Trunked Transport Facility/ Mile High Capacity DS3	Mile									
Direct Trunked Transport Facility/ Mile Synchronous Optical Channel OC3	Mile									
Direct Trunked Transport Facility/ Mile Synchronous	Mile									

REDACTED

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Optical Channel OC12		
Direct Trunked Transport Facility/ Mile ESALT 2 Mbps DTF-E1	Circuit Miles	[REDACTED]
Direct Trunked Transport Facility/ Mile ESALT 2 Mbps DTF-E2	Circuit Miles	
Direct Trunked Transport Facility/ Mile ESALT 2 Mbps DTF-E3	Circuit Miles	
Direct Trunked Transport Facility/ Mile ESALT 2 Mbps DTF-E4	Circuit Miles	
Direct Trunked Transport Facility/ Mile ESALT 10 Mbps DTF-E1	Circuit Miles	
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	

REDACTED

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 Facility ESALT 10 Mbps	Circuit	
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	

REDACTED

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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**REDACTED**



## 2017 CAF ICC Data Collection

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Study Area: TOLEDO TELEPHONE CO (ID: 522447)

## Study Area USAC Reports

[ View Printer-friendly report ]

2017 USAC Data Report (Test Period 2017-2018) v

## CONNECT AMERICA FUND

Data to be provided to USAC/FCC in June 2017 for CAF ICC Purposes

Current Settlement Type: Cost

Test Period 7/1/17-6/30/18 Post True-up (Filing) View	
<b>Rate-of-Return (ROR) Carrier Revenue Requirement</b>	
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 ^ 6)
6	ROR Carrier Revenue Requirement (Line 4 x Line 5)
7	Pool Administration Expenses
8	Total ROR Carrier Revenue Requirement (Line 6 + Line 7)
<b>Revenues from Reformed Inter-carrier Compensation (ICC) Rates</b>	
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)
<b>Eligible Recovery</b>	
14	TRS Increment
15	Regulatory Fees Increment
16	NANPA Increment
17	Interstate Local Switching Support for Price Cap Affiliates
18	Adjustment for Double Recovery or Corrections
19	Test Period 15/16 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)
<b>Revenues from Access Recovery Charges (ARC)</b>	
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)
<b>Connect America Fund (CAF) ICC Support**</b>	
25	Connect America Fund (CAF) ICC Support (Line 20 - Line 24)
<b>Revised CAF ICC Support with Imputed ARC Revenues for Broadband-Only Loops</b>	
26	ARC Revenue Adjustment
27	<b>Adjusted Test Period 2017-2018 CAFICC Support (Line 25 - Line 26)</b>

## 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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**REDACTED**



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Study Area: **TOLEDO TELEPHONE CO (ID: 522447)**

Access Recovery Charges

Recalculate ARC Rates & CAF Support revenues

[Test Period 2017-18 Pre-True-up View](#)
[Test Period 2017-18 Post-True-Up \(Filing\) View](#)

Test Period 2017-2018 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
TOLEDO Study Area Summary	[REDACTED]									

**REDACTED**



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 CO**

**Philip Cappelonga**

Digitally signed by Philip Cappelonga DN: cn=Philip Cappelonga, email=phil@toledotel.com, O=toledo telephone co, | = , Date: 5/18/2017

Date: **5/18/2017**

Printed name of Authorized Officer: **Philip Cappelonga**

Title or position of Authorized Officer: **Chief Financial Officer**

Telephone number of Authorized Officer: **360-864-2004**

Study Area Code of Reporting Carrier

**522447**

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

**6/16/2017**

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 Carriers Association, Inc. 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 is accurate.

Name of Authorized Agent: National Exchange Carriers Association, Inc.

Name of Reporting Carrier: TOLEDO TELEPHONE CO

**Philip Cappalonga**  
Digitally signed by Philip Cappalonga DN: cn=Philip Cappalonga, email=phil@toledotel.com, O=toledo telephone co, | = , Date: 5/18/2017

Date: 5/18/2017

Printed name of Authorized Officer: Philip Cappalonga

Title or position of Authorized Officer: Chief Financial Officer

Telephone number of authorized officer: 360-864-2004

Study Area Code of Reporting Carrier: 522447

Filing Due Date for this form (mm/dd/yyyy): 6/16/2017

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: **TOLEDO TELEPHONE CO**

**Philip Cappalonga**

Digitally signed by Philip Cappalonga DN: cn=Philip Cappalonga, email=phil@toledotel.com, O=toledo telephone co, | = , Date: 5/18/2017

Date: **5/18/2017**

Printed name of Authorized Officer or employee: **Philip Cappalonga**

Title or position of Authorized Officer or employee: **Chief Financial 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)

**6/16/2017**

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 CO**

**Philip Cappalonga**

Digitally signed by Philip Cappalonga DN:cn=Philip Cappalonga,email=phil@toledotel.com,O=toledo telephone co,|= , Date:5/18/2017

Date: **5/18/2017**

Printed name of Authorized Officer or employee: **Philip Cappalonga**

Title or position of Authorized Officer or employee: **Chief Financial 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)

**6/16/2017**

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.

RATE FLOOR DATA COLLECTION - OMB Control Number 3060-0986

Block 1 - Contact Information

ROW #	DATA ELEMENT	FORMAT OF REQUESTED DATA	RESPONSE
1	Carrier Study Area Code	6 numeric digits	522447
2	Carrier Study Area Name	alpha characters	TOLEDO TELEPHONE COMPANY INC.
3	Service Provider Identification Number	9 numeric digits	143004986
4	<b>Residential Local Service Charge Effective Date</b>	mm/dd/yy	06/01/17
5	Contact Name	alpha characters	Cappalonga, Philip G
6	Contact Telephone Number (include area code)	9 numeric digits	360-864-2004
7	Sheet Number	numeric digit(s)	
8	Total Number of Sheets	numeric digit(s)	

Block 2- Residential Local Service Rates, Fees, and Line Counts

Column 1 Residential Local Service Charge	Column 2 State Subscriber Line Charge	Column 3 State Universal Service Fee	Column 4 Mandatory Extended Area Service Charge	Column 5 Loops	Column 6 Exchange Name/ Zone Name	Column 7 Class Of Service

REDACTED

Rate Floor Template

**Certification of Officer as to the Accuracy of the Data Reported for the Rate Floor Data**

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

Name of Reporting Carrier The Toledo Telephone Co., Inc.

Signature of authorized officer *Philip G. Cappalonga*

Date 6/12/2017

Printed name of authorized officer Philip G. Cappalonga

Title or position of authorized officer CFO

Telephone number of authorized officer: (360) 864-2004 ext.

Study Area Code of Reporting Carrier 522447

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

07/01/2017



I certify that our company receives or is projected to receive High Cost Loop Support (or Frozen High Cost Support that is based on HCLS or High Cost Model Support) during the period July 2017 through June 2018, but has no monthly residential rates (plus charges as defined) less than \$22.49.