



MOSSADAMS

June 16, 2020

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601 W. Riverside Avenue
Suite 1800
Spokane, WA 99201

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

RE: Docket UT-200003
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 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, 2020 through June 30, 2021, Tariff Review Plan (TRP) data governing the local switched access rates and Local Rate Floor Data. 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, 2020 through June 30, 2021 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 certification 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.

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)



2020 CAF ICC Data Collection

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

Intrastate Revenues (FCC TRP exhibit)

Download TRP Data in Excel

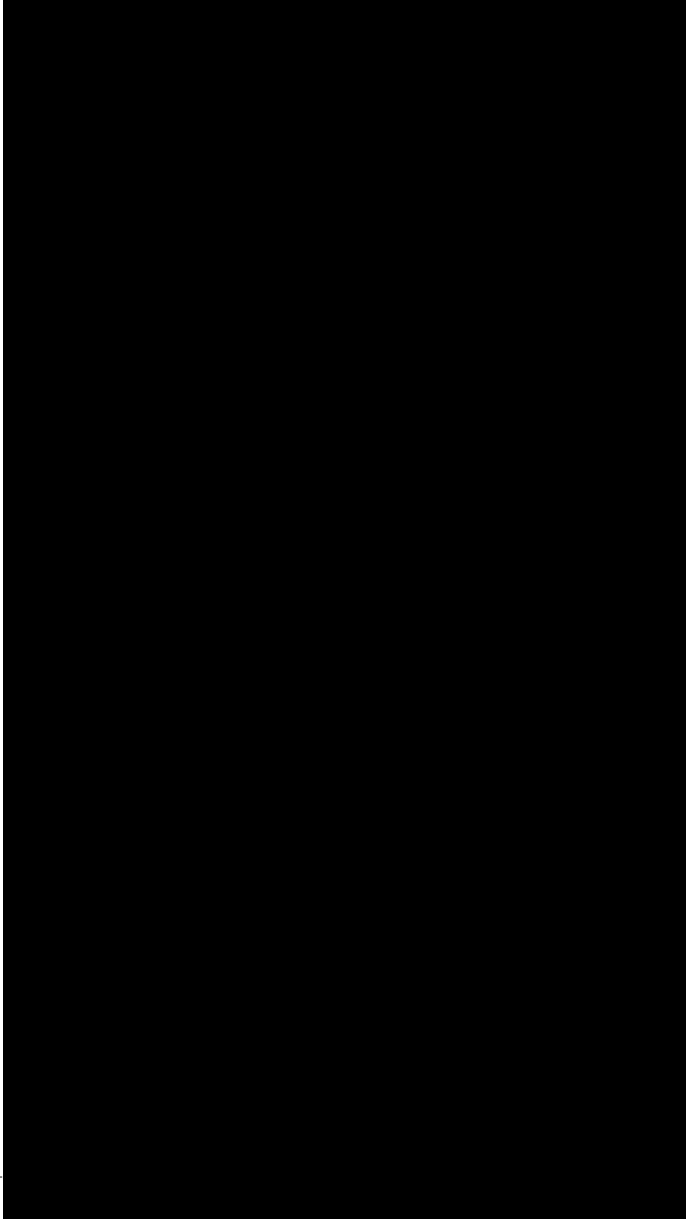
Intrastate Revenues

Test Year 2020-2021 Expected Maximum Intrastate Revenue:

Col D -- Rate Element Description	Col E -- Unit of Demand	Col F -- 7/1/2020 Interstate Rate	Col G -- Test Year 2019-2020 Current Intrastate Rate	Col H -- 7/1/2020 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 7/1/2020 proposed intrastate rate and FY2011 Demand	Col K -- FY 2019 Intrastate Units Terminating for Non-Dedicated and total for Dedicated Elements	Col L -- Test Year 2020-2021 Forecasted Intrastate Units	Col M -- [[L/K]^ (12/21)-1] *100 Intrastate Units Growth Rate %	Col N -- H*L TY 2020-21 Forecasted Intrastate Revenue
Terminating End Office Access Service Terminating End Office, Premium, per access minute	MOU	\$0.00000000	\$0.00070000	\$0.00000000						
Terminating End Office Access Service Terminating End Office, Non-Premium, per access minute	MOU	\$0.00000000	\$0.00070000	\$0.00000000						
Entrance Facility, Per Termination Voice Grade Two Wire	Termination	\$81.47	\$82.70	\$81.47						
Entrance Facility, Per Termination Voice Grade Four Wire	Termination	\$130.37	\$132.34	\$130.37						
Entrance Facility, Per Termination High Capacity DS1	Termination	\$397.17	\$403.18	\$397.17						
Entrance Facility, Per Termination High Capacity DS3	Termination	\$3,626.49	\$3,681.34	\$3,626.49						
Entrance Facility, Per Termination Synchronous Optical Channel OC3	Termination	\$3,697.93	\$3,753.86	\$3,697.93						
Entrance Facility, Per Termination Synchronous Optical Channel OC12	Termination	\$3,948.19	\$4,007.91	\$3,948.19						
Entrance Facility, Per Termination ESALT 2 Mbps	Circuit	\$703.47	\$714.11	\$703.47						
Entrance Facility, Per Termination ESALT 10 Mbps	Circuit	\$758.20	\$769.67	\$758.20						
Entrance Facility, Per Termination ESALT 50 Mbps	Circuit	\$982.30	\$997.16	\$982.30						
Direct Trunked Transport Facility/Mile Voice Grade - Two Wire & Four Wire	Mile	\$5.79	\$5.88	\$5.79						
Direct Trunked Transport Facility/Mile High Capacity DS1	Mile	\$27.22	\$27.63	\$27.22						
Direct Trunked Transport Facility/Mile High Capacity DS3	Mile	\$237.04	\$240.63	\$237.04						
Direct Trunked Transport Facility/Mile Synchronous Optical Channel OC3	Mile	\$253.74	\$257.58	\$253.74						
Direct Trunked Transport Facility/Mile Synchronous Optical Channel OC12	Mile	\$318.49	\$323.31	\$318.49						
Direct Trunked Transport Facility/Mile ESALT 2 Mbps DTF-E1	Circuit Miles	\$80.15	\$81.36	\$80.15						
Direct Trunked Transport Facility/Mile ESALT 2 Mbps DTF-E2	Circuit Miles	\$53.44	\$54.25	\$53.44						
Direct Trunked Transport Facility/Mile ESALT 2 Mbps DTF-E3	Circuit Miles	\$79.58	\$80.78	\$79.58						
Direct Trunked Transport Facility/Mile ESALT 2 Mbps DTF-E4	Circuit Miles	\$133.24	\$135.26	\$133.24						
Direct Trunked Transport Facility/Mile ESALT 10 Mbps DTF-E1	Circuit Miles	\$203.23	\$206.30	\$203.23						
Direct Trunked Transport Facility/Mile ESALT 10 Mbps DTF-E2	Circuit Miles	\$121.96	\$123.80	\$121.96						
Direct Trunked Transport Facility/Mile ESALT 10 Mbps DTF-E3	Circuit Miles	\$200.30	\$203.33	\$200.30						
Direct Trunked Transport Facility/Mile ESALT 10 Mbps DTF-E4	Circuit Miles	\$410.84	\$417.05	\$410.84						
Direct Trunked Transport Facility/Mile ESALT 50 Mbps DTF-E1	Circuit Miles	\$569.04	\$577.65	\$569.04						
Direct Trunked Transport Facility/	Circuit Miles	\$379.38	\$385.12	\$379.38						

Mile ESALT 50 Mbps DTF-E2				
Direct Trunked Transport Facility/ Mile ESALT 50 Mbps DTF-E3	Circuit Miles	\$654.18	\$664.07	\$654.18
Direct Trunked Transport Facility/ Mile ESALT 50 Mbps DTF-E4	Circuit Miles	\$1,165.85	\$1,183.48	\$1,165.85
Direct Trunked Transport Facility/ Termination on Voice Grade - Two Wire & Four Wire	Termination	\$58.32	\$59.20	\$58.32
Direct Trunked Transport Facility/ Termination on High Capacity DS1	Termination	\$141.18	\$143.32	\$141.18
Direct Trunked Transport Facility/ Termination on High Capacity DS3	Termination	\$906.61	\$920.32	\$906.61
Direct Trunked Transport Facility/ Termination on Synchronous Optical Channel OC3	Termination	\$943.96	\$958.24	\$943.96
Direct Trunked Transport Facility/ Termination on Synchronous Optical Channel OC12	Termination	\$2,055.29	\$2,086.38	\$2,055.29
Direct Trunked Transport Facility/ Termination on ESALT 2 Mbps	Circuit terms	\$187.02	\$189.85	\$187.02
Direct Trunked Transport Facility/ Termination on ESALT 10 Mbps	Circuit terms	\$228.64	\$232.10	\$228.64
Direct Trunked Transport Facility/ Termination on ESALT 50 Mbps	Circuit terms	\$279.44	\$283.67	\$279.44
Multiplexing, Per Arrangement DS3 to DS1	Termination	\$827.17	\$839.68	\$827.17
Multiplexing, Per Arrangement DS1 to Voice	Termination	\$319.37	\$324.20	\$319.37
Customer Node Per Node OC3 155.52 Mbps	Port	\$858.67	\$871.66	\$858.67
Customer Node Per Node OC12 622.08 Mbps	Port	\$2,480.63	\$2,518.15	\$2,480.63
Customer Premises Port, Per Port OC3 155.52 Mbps	Port	\$281.75	\$286.01	\$281.75
Customer Premises Port, Per Port STS-1 51.84 Mbps	Port	\$338.28	\$343.40	\$338.28
Customer Premises Port, Per Port DS3 44.736 Mbps	Port	\$338.28	\$343.40	\$338.28
Customer Premises Port, Per Port DS1 1.544 Mbps	Port	\$86.72	\$88.03	\$86.72
Add/Drop Multiplexing Central Office Port, Per Port DS1 1.544 Mbps	Port	\$69.37	\$70.42	\$69.37
Add/Drop Multiplexing Central Office Port, Per Port OC3 155.52 Mbps	Port	\$281.75	\$286.01	\$281.75
Add/Drop Multiplexing Central Office Port, Per Port DS3 44.736 Mbps	Port	\$173.46	\$176.08	\$173.46
Network Blocking, Per Blocked Call Network Blocking, Per Blocked Call, Applies to FGD only	Call	\$0.01640000	\$0.01660000	\$0.01640000
ESALT Real Time CoS/QoS, Per ESALT DTF-E1 Facility ESALT 2 Mbps	Facility	\$15.30	\$15.53	\$15.30
ESALT Real Time CoS/QoS, Per ESALT DTF-E1 Facility ESALT 10 Mbps	Facility	\$76.53	\$77.69	\$76.53
ESALT Real Time CoS/QoS, Per ESALT DTF-E1 Facility ESALT 50 Mbps	Facility	\$238.16	\$241.76	\$238.16
ESALT Entrance Facility Protection, Per ESALT Entrance Facility ESALT 2 Mbps	Circuit	\$284.10	\$288.40	\$284.10
ESALT Entrance Facility Protection, Per ESALT Entrance Facility ESALT 10 Mbps	Circuit	\$284.10	\$288.40	\$284.10
ESALT Entrance Facility Protection, Per ESALT Entrance Facility ESALT 50 Mbps	Circuit	\$284.10	\$288.40	\$284.10
Common Channel Signaling Network Connect on Signaling Mileage Facility, Per Mile	Mile	\$7.82	\$7.94	\$7.82
Common Channel Signaling Network Connect on Signaling Mileage Termination, Per Termination	Termination	\$78.50	\$79.69	\$78.50
Common Channel Signaling Network Connect on Signaling Entrance Facility, Per Facility	Facility	\$150.37	\$152.64	\$150.37
Common Channel Signaling Network Connect on STP Port, Per Port	Port	\$774.82	\$786.54	\$774.82

Terminating Tandem Switched Transport Terminating Tandem Sw tched Transport Facility	Minutes / Mile	\$0.00020000	\$0.00020300	\$0.00020000
Terminating Tandem Switched Transport Terminating Tandem Sw tched Termination	Minutes	\$0.00104600	\$0.00106200	\$0.00104600
Terminating Tandem Switched Transport Terminating Tandem Sw tching	Minutes	\$0.00263900	\$0.00267900	\$0.00263900
Nonrecurring Charges Voice Grade Two Wire	Facility	\$480.90	\$488.17	\$480.90
Nonrecurring Charges Voice Grade Four Wire	Facility	\$480.90	\$488.17	\$480.90
Nonrecurring Charges High Capacity DS1	Facility	\$352.68	\$358.01	\$352.68
Nonrecurring Charges High Capacity DS3	Facility	\$475.56	\$482.75	\$475.56
Nonrecurring Charges Synchronous Optical Channel OC3	Facility	\$384.72	\$390.54	\$384.72
Nonrecurring Charges Synchronous Optical Channel OC12	Facility	\$384.72	\$390.54	\$384.72
Nonrecurring Charges Interim NXX Translation, Per Order	Order	\$235.11	\$238.67	\$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	\$479.49	\$472.35
Nonrecurring Charges Trunk Activation, per 24 trunks activated or fraction thereof on a per order basis	Order	\$490.51	\$497.93	\$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	\$578.57	\$569.95
Nonrecurring Charges ESALT 10 Mbps	Facility	\$569.95	\$578.57	\$569.95
Nonrecurring Charges ESALT 50 Mbps	Facility	\$569.95	\$578.57	\$569.95
Nonrecurring Charges ESALT Direct Trunked Termination, per ESALT Direct Trunked Termination installed	Order	\$375.50	\$381.18	\$375.50
Nonrecurring Charges ESALT Entrance Facility Protection, per ESALT Entrance Facility	Facility	\$576.11	\$584.82	\$576.11





2020 CAF ICC Data Collection

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

Study Area USAC Reports

[View printer-friendly report]

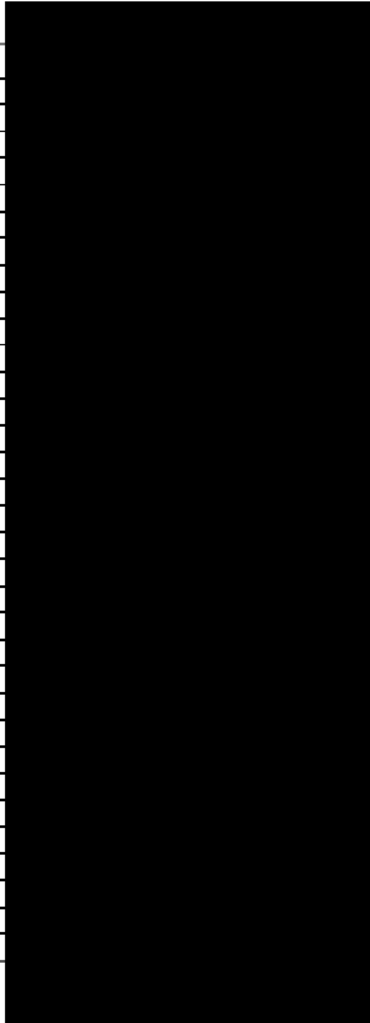
2020 USAC Data Report (Test Period 2020-2021)

CONNECT AMERICA FUND

[Data to be provided to USAC/FCC in June 2020 for CAF ICC Purposes]

Settlement Type: Cost

Test Period 7/1/20-6/30/21 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 ^ 9)
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 Pre-Cap Affiliates or Estimated Duplicate LSS Costs in CAF II
18	Adjustment for Double Recovery or Corrections
19	Test Period 18/19 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 2020-2021 CAF ICC 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: TOLEDO TELEPHONE COMPANY INC. (ID: 522447)

Access Recovery Charges

Recalculate ARC Rates & CAF Support revenues

Test Period 2020-21 Pre-True-up View Test Period 2020-21 Post-True-Up (Filing) View

Test Period 2020-2021 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]									

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.**

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:5/27/2020

Date: **5/27/2020**

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)

6/16/2020

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) <u>National Exchange Carriers Association, Inc.</u> 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 : <u>National Exchange Carriers Association, Inc.</u>					
Name of Reporting Carrier: <u>TOLEDO TELEPHONE COMPANY INC.</u>					
Signature of Authorized Officer: <u>Philip Cappalonga</u>				Digitally signed by Philip Cappalonga DN cn=Philip Cappalonga,email=phil@toledotel net,O=toledo telephone company inc.,l= , Date 5/27/2020	
Date: <u>5/27/2020</u>					
Printed name of Authorized Officer: <u>Philip Cappalonga</u>					
Title or position of Authorized Officer: <u>Chief Financial Officer</u>					
Telephone number of authorized officer: <u>360-864-2004</u>					
Study Area Code of Reporting Carrier		<u>522447</u>		Filing Due Date for this form (mm/dd/yyyy)	<u>6/16/2020</u>
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 COMPANY INC.**

Signature of Authorized Officer or employee: **Philip Cappalonga**
Digitally signed by Philip Cappalonga DN cn=Philip Cappalonga, email=phil@toledotel.net, O=toledo telephone company inc., | = , Date 5/27/2020

Date: **5/27/2020**

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)

6/16/2020

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.**

Signature of Authorized Officer or employee: **Philip Cappalonga**
Digitally signed by Philip Cappalonga DN cn=Philip Cappalonga, email=phil@toledotel.net, O=toledo telephone company inc., |, = , Date 5/27/2020

Date: **5/27/2020**

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)

6/16/2020

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.

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 Cappalonga

Date:
6/10/20

Printed name of Authorized Officer:
Philip Cappalonga

Title or position of Authorized Officer
CFO

Telephone number of Authorized Officer
360-864-2004

Study Area Code of Reporting Carrier	<i>522447</i>		Filing Due Date for this form (mm/dd/yyyy)	<i>07/01/2020</i>	
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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 2020 through June 2021, but has no monthly residential rates (plus charges as defined) less than \$18.00.