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

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m MOSS ext{-}ADAMS}_{\scriptscriptstyle
m LLP}$

Certified Public Accountants | Business Consultants

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 Pend Oreille Telephone Company 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 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.

In addition Pend Oreille Telephone Company 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; 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.



State of Washington Utilities and Transportation Commission June 16, 2017 Page 2

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.

Sincerely,

Tym Rutkowski, Regulatory Consulting Manager for

Moss Adams LLP

Enclosures

cc: Mr. Mark Mantall (Via-Email)

Ms. Susan Case (Via-Email)



2017 CAF ICC Data Collection

NECA Home NECA Data Collections Contact Us CAF ICC - Instructions & Documents Paper Certification Tracking Logout
Logged in User: Jaye Rishard

Home Select Company Main Page Study Area Data Input Menu 🕨 CAF & ARC Output 🕨 Historic Reports 🕨 E-Certification 🕨

Study Area: PEND OREILLE TEL. (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

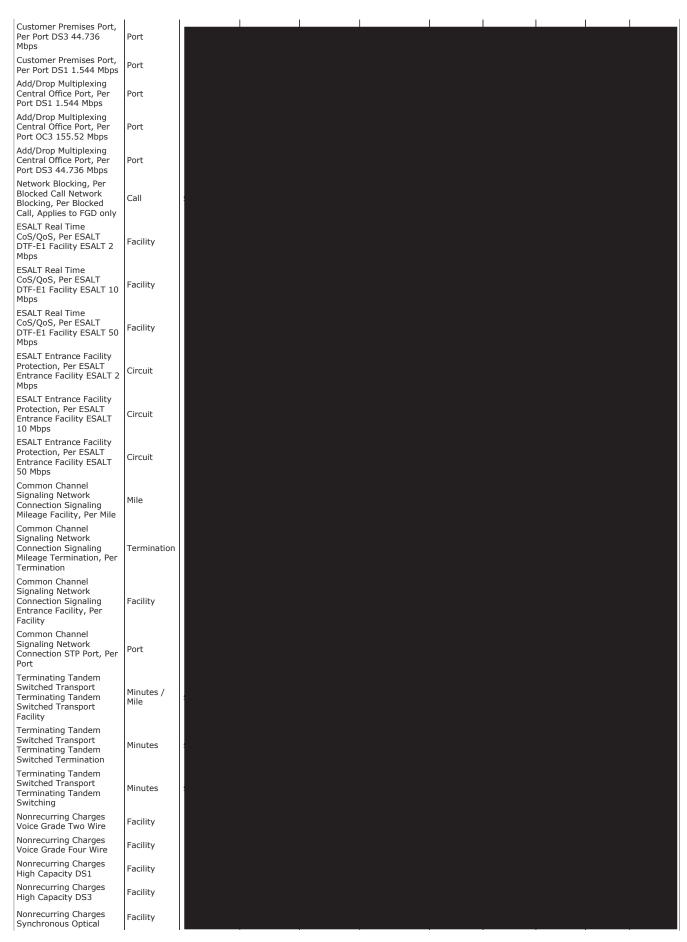
Intrastate Revenues

Test Year 2017-2018 Expected Maximum Intrastate Revenue:

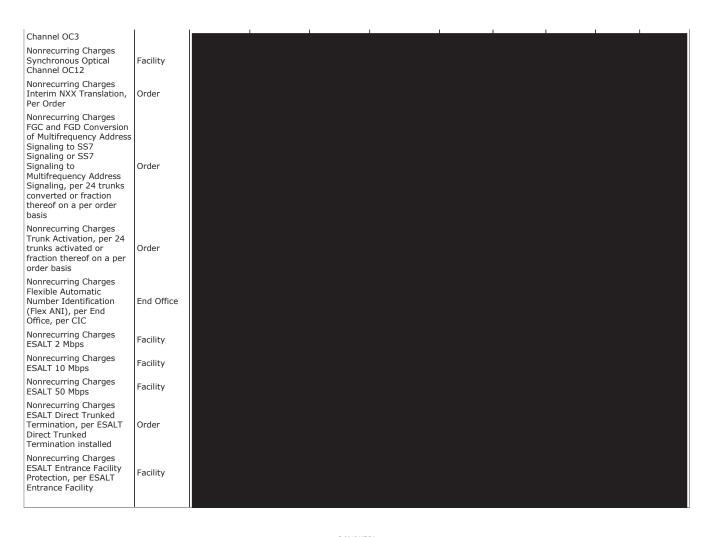
Col D	Col E	Col F	Col G	Col H	Coll	Col J	Col K	Col L	Col M	Col N
						 H*I			[(L/K)^	H*L
Rate Element Description	Unit of Demand	7/1/2017 Interstate Rate	Test Year 2016-2017 Current Intrastate Rate	7/1/2017 Proposed Intrastate Rate	FY 2011 Intrastate Units: Terminating for Non-Dedicated or Originating 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	(12/21)-1] *100 Intrastate Units Growth Rate %	TY 2017-18 Forecasted Intrastate Revenue
Terminating End Office										
Access Service Terminating End Office, Premium, per access minute	мои									
Terminating End Office Access Service										
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										

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2017 CAF ICC Data Collection

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

Study Area USAC Reports

[View Printer-friendly report]

2017 USAC Data Report (Test Period 2017-2018)

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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	
	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 ^ 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)	
	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	
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	
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)	
	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	\neg
26	ARC Revenue Adjustment	
27	Adjusted Test Period 2017-2018 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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Holding Company: RURAL TELEPHONE CO. (ID: 200000256)

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 P	eriod 2017-2	018 Post	t True-U	p (Filing) Vi	iew			
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 Metaline Falls				,	'					'
Study Area Summary										

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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 Orei	lle Telephone	Company		
Signature of Authorized Officer	11.([]]			_{Date} 05/23/2017
Printed name of Authorized Officer Mich	ael J. Martell			
Title or position of Authorized Officer ViCo	e-President			
Telephone number of Authorized Officer:	(208) 366-261			The state of the s
Study Area Code of Reporting Carrier	522418	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 Of	ficer to Author	ize an Agent to File Data Reported	on Behalf of Rep	porting Carrier
reporting carrier. I also certify that I am a	n officer of the rep	r <u>Association, Inc. (NECA)</u> is authorize orling carrier; my responsibilities include envided to the Authorized Agent are accurate.	d to submit the inforr	nation reported on behalf of the of the data provided to the Authorized
Name of Authorized Agent National Exch	nange Carrier A	ssociation, Inc. (NECA)		
Name of Reporting Carrier Pend Oreille	e Telephone	Company		
Signature of Authorized Officer		M		_{Date} 05/23/2017
Printed name of Authorized Officer Michael	el J Martell			
Title or position of Authorized Officer Vice-	President			
Telephone number of Authorized Officer: (2	.08) 366-261	4 ext.		
Study Area Code of Reporting Carrier	522418	Filing Due Date for this form (mm/dd/yyyy)	6/16/2017	
	on this form can be imprisonment	punished by fine or forfeiture under the Commu under Title 18 of the United States Code, 18 U.	inications Act of 1934, S.C. § 1001.	47 U.S.C. §§ 502, 503(b), or fine or

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 O	reille Teleph	one Company		
Signature of authorized officer			Dale	05/23/2017
Printed name of authorized officer Mic	hael J. Wart	eli		
Title or position of authorized officer Vi	ce-Presiden	t		
Telephone number of authorized officer:	(20,8) 366-2	ହି14		
Study Area Code of Reporting Carrier	522418	Filing Due Date for this form (mm/dd/yyyy)	6/16/2017	
Persons willfully making false st	atements on this form	n can be punished by fine or forfeiture under t onment under Title 18 of the United States Cod	he Communications e, 18 U.S.C. § 1001.	Act of 1934, 47 U.S.C. §§ 502,

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 Or	eille Teleph	one Company		
Signature of authorized officer		Mittel	Date	05/23/2017
Printed name of authorized officer Mich	nael J Marte	ell		
	e-President		,,,,,	
	(208) 366-26	<u> </u>		
Study Area Code of Reporting Carrier	522418	Filing Due Date for this form (mm/dd/yyyy)	6/16/2017	
	toments on this form	can be nunished by fine or forfeiture under th	e Communications	Act of 1934, 47 U.S.C. §§ 502,

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	
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Block 1 - Contact Information

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ROW #	DATA ELEMENT	MENT	FORMAT OF REQUESTED DATA	TOF TED		RESPONSE	
_	Carrier Study Area Code		6 numeric digits		522418		
2	Carrier Study Area Name		alpha characters		PEND OREILLE TELEPHONE COMPANY	HONE COMPANY	
3	Service Provider Identification Number	on Number			143002595		
4	Residential Local Service Charge Effective Date	Charge Effective Date	wm/dd/yy		06/01/17		
2	Contact Name		alpha characters		Arrington, Beverly A		
9	Contact Telephone Number (include area code)	(include area code)	9 numeric digits		208-366-2614		
7	Sheet Number		numeric digit(s)	s) (s			
_∞	Total Number of Sheets		numeric digit(s)	(S			
	Column 1 Residential Local Service Charge	Column 2 State Subscriber Line Charge	Column 3 State Universal Service Fee	Column 4 Manditory Extended Area Service Charge	Column 5 Loops	Column 6 Exchange Name/ Zone Name	Column 7 Class Of Service
0						lone	Residential
10						lone	Lifeline
7						Cusick	Residential
12						Cusick	Lifeline
13						Metaline Falls	Residential
14						Metaline Falls	Lifeline

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TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING RATE FLOOR DATA ON THE CARRIER'S BEHALF:

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ange Carrier Association (behalf of the reporting c cy of the actual rate floor d to the authorized ager	NECA) arrier. I also certify that I am an off r data provided to the authorized ag tt is accurate.	is ficer of the report gent; and, to the l	s authorized to submit ing carrier; my responsibilities best of my knowledge, the
elle relephone Co	impany		00/40/0047
ael J. Martell			_{Date} 06/13/2017
e-President			
208) 366-2614 _{ext.}	THE RESERVE TO THE PARTY OF THE	10-22	
522418	Filing Due Date for this form (mm/dd/yyyy)	07/01/2017	
	inge Carrier Association (legislation) (legi	penale Carrier Association (NECA) penale of the reporting carrier. I also certify that I am an offective of the actual rate floor data provided to the authorized agent is accurate. to submit the information reported on this form on behalf of ein based on data provided by the reporting carrier; and to exchange Carrier Association (NECA) pelle Telephone Company acel J. Martell e-President 208), 366-2614 ext. Filing Due Date for this form	behalf of the reporting carrier. I also certify that I am an officer of the reporting to the actual rate floor data provided to the authorized agent; and, to the authorized agent is accurate. to submit the information reported on this form on behalf of the reporting carrier based on data provided by the reporting carrier; and to the best of my known and the carrier Association (NECA) carrier ass

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 Pend Ore	eille Telephone Co	mpany		
Signature of authorized officer	16612	Marke		Date 06/13/2017
Printed name of authorized officer Mich	nael J. Martell			
Title or position of authorized officer Vic	e-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)	07/01/2017	