

Electronic Filing

June 12, 2015

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 Inter-carrier 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, 2015 through June 30, 2016, 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, 2015 through June 30, 2016 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 and twelve unredacted copies of each confidential. 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 via electronic mail at Eric.Votaw@mossadams.com or by telephone at 209-955-6116 number.

Sincerely,

A handwritten signature in blue ink that reads "Eric N. Votaw". The signature is fluid and cursive, with a long horizontal stroke at the end.

Eric Votaw, Senior Manager for
Moss Adams LLP

Enclosures

cc: Mr. Mark Mantall (Via-Email)
Ms. Susan Case (Via-Email)



2015 CAF ICC Data Collection

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Study Area: PEND OREILLE TEL. (ID: 522418)

Holding Company: RURAL TELEPHONE CO. (ID: 20000256)

Intrastate Revenues (FCC TRP exhibit)

Option 1: View TRP Output in Excel

Option 2: Download TRP Data in Excel

Intrastate Revenues

Test Year 2015-2016 Expected Maximum Intrastate Revenue: ██████████

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	7/1/2015 Interstate Rate	Test Year 2014-2015 Current Intrastate Rate	7/1/2015 Proposed Intrastate Rate	FY 2011 Intrastate Units: Terminating for Non-Dedicated or Originating and Terminating for Dedicated Elements	Intrastate Price-out with 7/1/2015 proposed intrastate rate and FY2011 Demand	FY 2014 Intrastate Units: Terminating for Non-Dedicated and total for Dedicated Elements	Test Year 2015-2016 Forecasted Intrastate Units	Intrastate Units Growth Rate %	TY 2015-16 Forecasted Intrastate Revenue
Terminating End Office Access Service	MOU									
Terminating End Office, Premium, per access minute										
Terminating End Office Access Service	MOU									
Terminating End Office, Non-Premium, per access minute										
Entrance Facility, Per Termination Voice Grade Two Wire	Terminatio									
Entrance Facility, Per Termination Voice Grade Four Wire	Terminatio									
Entrance Facility, Per Termination High Capacity DS1	Terminatio									
Entrance Facility, Per Termination High Capacity DS3	Terminatio									
Entrance Facility, Per Termination Synchronous Optical Channel OC3	Terminatio									
Entrance Facility, Per Termination Synchronous Optical Channel OC12	Terminatio									
Entrance Facility, Per Termination ESALT 2 Mbps	Circuit									
Entrance Facility, Per Termination ESALT 10 Mbps	Circuit									
Entrance Facility, Per Termination ESALT 50 Mbps	Circuit									

Redacted

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 Optical Channel OC12	Mile	
Direct Trunked Transport Facility/ Mile ESALT 2 Mbps DTF-E1	Circuit Miles	
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	Termination	

Redacted

Facility/Termination High Capacity DS1		
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	
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	Facility	

Redacted

Mbps		
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	Facility	

Redacted

OC3 Nonrecurring Charges Synchronous Optical Channel OC12	Facility	[Redacted]
Nonrecurring Charges Interim NXX Translation, Per Order	Order	
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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Study Area: **PEND OREILLE TEL. (ID: 522418)**
 Holding Company: **RURAL TELEPHONE CO. (ID: 200000256)**

Study Area USAC Reports

[View Printer-friendly report]

2015 USAC Data Report

CONNECT AMERICA FUND

Data to be Provided to USAC/FCC in June 2015 for CAF ICC Purposes

Current Settlement Type: Cost

Test Period 7/1/15-6/30/16 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 x 0.95 x 0.95 x 0.95)
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
18	Adjustment for Double Recovery or Corrections
19	Test Period 13/14 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)

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 TEL. (ID: 522418)**
 Holding Company: **RURAL TELEPHONE CO. (ID: 200000256)**

Access Recovery Charges

Recalculate ARC Rates & CAF Support revenues

Test Period 2015-2016 Pre-True-up View Test Period 2015-16 Post-True-Up (Filing) View

Test Period 2015-2016 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 Metaline Falls Study Area Summary	[REDACTED]			[REDACTED]						

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

Study Area - Exchange Level Residential Lines and Local Rates for ARC Calculation

[[Upload Residential Lines & Rates](#)]

[[Download NECA template](#)]

[Exchange Level Residential Lines & Rates](#) [Residential Lines & Rates Summary](#) [Study Area Test Period Lines](#)

Test Period 2015/2016

Study Area Lines for Test Period 2015/2016 - (July 1, 2015 - June 30, 2016)

Study Area ID	Test Year 2015-16 Residential Lines Excluding Life Lines	Test Year 2015-16 Single Line Business Lines	Test Year 2015-16 Multi-Line Business Lines
522418			

Data previously submitted on 3/26/2015 2:59:45 PM (Eastern Time)
Data submitted by Choua Her

[Records response entered/updated on the above part of the screen]

Redacted

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		05/26/15
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)	6/16/2015	
Persons willfully making false statements on this form can be punished 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	05/26/15	
Printed name of authorized officer Michael J. Martell			
Title or position of authorized officer Vice-President			
Telephone number of authorized officer: (208) 366-2644 ext			
Study Area Code of Reporting Carrier	522418	Filing Due Date for this form (mm/dd/yyyy)	6/16/2015
<p>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.</p>			

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 05/26/15

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)

6/16/2015

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,

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 **05/26/2015**

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)

6/16/2015

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	522418
2	Carrier Study Area Name	alpha characters	PEND OREILLE TELEPHONE COMPANY
3	Service Provider Identification Number	9 numeric digits	143002595
4	Residential Local Service Charge Effective Date	mm/dd/yy	07/01/15
5	Contact Name	alpha characters	Arrington, Beverly A
6	Contact Telephone Number (include area code)	9 numeric digits	208-366-2614
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
9							
10							
11							
12							
13							
14							

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 **Pend Oreille Telephone Company**

Signature of authorized officer



Date **06/09/2015**

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

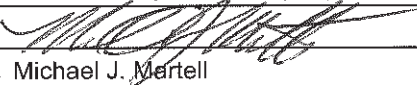
522418

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

07/01/2015

Rate Floor Data

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

<p>Certification of Officer to Authorize an Agent to File Rate Floor Data on Behalf of Reporting Carrier</p> <p>I certify that <u>National Exchange Carrier Association (NECA)</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 actual rate floor data provided to the authorized agent; and, to the best of my knowledge, the actual rate floor data provided to the authorized agent is accurate.</p> <p>I certify that I am authorized to submit the information reported on this form on behalf of the reporting carrier; that I have provided the information reported herein based on data provided by the reporting carrier; and to the best of my knowledge the information reported herein is accurate.</p>			
Name of Authorized Agent <u>National Exchange Carrier Association (NECA)</u>			
Name of Reporting Carrier <u>Pend Oreille Telephone Company</u>			
Signature of authorized officer 			Date <u>06/09/2015</u>
Printed name of authorized officer <u>Michael J. Martell</u>			
Title or position of authorized officer <u>Vice-President</u>			
Telephone number of authorized officer: <u>(208) 366-2614</u> ext. _____			
Study Area Code of Reporting Carrier	<u>522418</u>	Filing Due Date for this form (mm/dd/yyyy)	<u>07/01/2015</u>