



MOSSADAMS

June 14, 2019

T (209) 955-6100
F (209) 955-6199

3121 W. March Lane
Suite 200
Stockton, CA 95219

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

RE: Docket UT-190004
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 with the Washington Utilities and Transportation Commission this Request for Confidential Treatment of Information (the "Request") on behalf of Pend Oreille Telephone Company. 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, 2018 through June 30, 2019, 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, 2019 through June 30, 2020 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.

Pend Oreille Telephone Company is an A-CAM support recipient; therefore, Pend Oreille Telephone Company is not subject to the Rate Floor Data Collection 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.

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. Mark Martell (Via-Email)
Ms. Susan Case (Via-Email)

REDACTED



2019 CAF ICC Data Collection

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Logged in User: Samantha Simatos

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

Study Area: **PEND OREILLE TELEPHONE COMPANY (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 2019-2020 Expected Maximum Intrastate Revenue [REDACTED]

Col D --	Col E --	Col F --	Col G --	Col H --	Col I --	Col J H*L	Col K --	Col L --	Col M -- [(L/K)^ (12/21)-1] *100	Col N -- H*L
Rate Element Description	Unit of Demand	7/1/2019 Interstate Rate	Test Year 2018-2019 Current Intrastate Rate	7/1/2019 Proposed Intrastate Rate	FY 2011 Intrastate Units Terminating for Non-Dedicated or Originating and Terminating for Dedicated Elements	Intrastate Price-out with 7/1/2019 proposed intrastate rate and FY2011 Demand	FY 2018 Intrastate Units Terminating for Non-Dedicated and total for Dedicated Elements	Test Year 2019-2020 Forecasted Intrastate Units	Intrastate Units Growth Rate %	TY 2019-20 Forecasted Intrastate Revenue
Terminating End Office Access Service Terminating End Office, Premium, per access minute	MOU	\$0.00070000	\$0.00213300	\$0.00070000						
Terminating End Office Access Service Terminating End Office, Non-Premium, per access minute	MOU	\$0.00070000	\$0.00213300	\$0.00070000						
Entrance Facility, Per Termination on Voice Grade Two Wire	Termination	\$34.14	\$34.29	\$34.14						
Entrance Facility, Per Termination on Voice Grade Four Wire	Termination	\$54.62	\$54.86	\$54.62						
Entrance Facility, Per Termination on High Capacity DS1	Termination	\$166.39	\$167.14	\$166.39						
Entrance Facility, Per Termination on High Capacity DS3	Termination	\$1,519.14	\$1,525.95	\$1,519.14						
Entrance Facility, Per Termination on Synchronous Optical Channel OC3	Termination	\$1,549.08	\$1,556.02	\$1,549.08						
Entrance Facility, Per Termination on Synchronous Optical Channel OC12	Termination	\$1,653.91	\$1,661.32	\$1,653.91						
Entrance Facility, Per Termination on ESALT 2 Mbps	Circuit	\$294.69	\$296.01	\$294.69						
Entrance Facility, Per Termination on ESALT 10 Mbps	Circuit	\$317.62	\$319.04	\$317.62						
Entrance Facility, Per Termination on ESALT 50 Mbps	Circuit	\$411.50	\$413.34	\$411.50						
Direct Trunked Transport Facility/ Mile Voice Grade - Two Wire & Four Wire	Mile	\$2.43	\$2.44	\$2.43						
Direct Trunked Transport Facility/ Mile High Capacity DS1	Mile	\$11.42	\$11.47	\$11.42						
Direct Trunked Transport Facility/ Mile High Capacity DS3	Mile	\$99.30	\$99.74	\$99.30						
Direct Trunked Transport Facility/ Mile Synchronous Optical Channel OC3	Mile	\$106.29	\$106.77	\$106.29						
Direct Trunked Transport Facility/ Mile Synchronous Optical Channel OC12	Mile	\$133.41	\$134.01	\$133.41						
Direct Trunked Transport Facility/ Mile ESALT 2 Mbps DTF-E1	Circuit Miles	\$33.56	\$33.71	\$33.56						
Direct Trunked Transport Facility/ Mile ESALT 2 Mbps DTF-E2	Circuit Miles	\$22.40	\$22.50	\$22.40						
Direct Trunked Transport Facility/ Mile ESALT 2 Mbps	Circuit Miles	\$80.78	\$81.14	\$80.78						

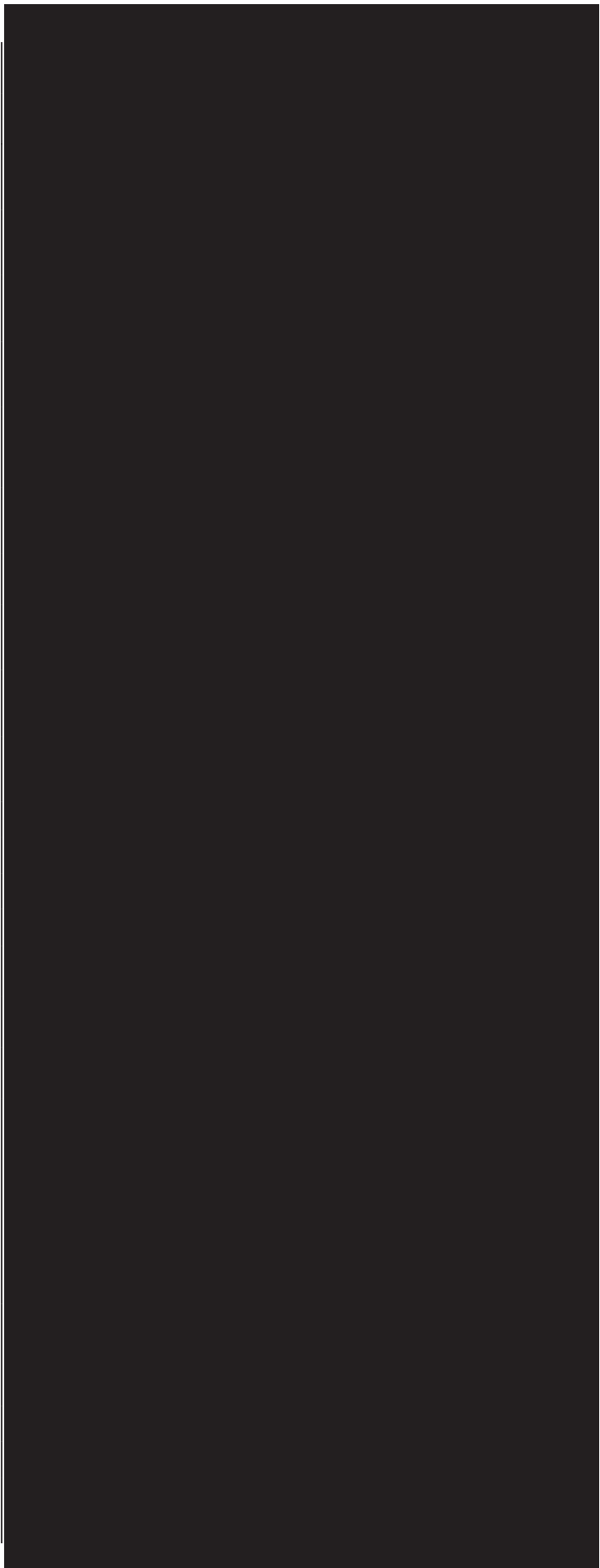
REDACTED

DTF-E3				
Direct Trunked Transport Facility/ Mile ESALT 2 Mbps DTF-E4	Circuit Miles	\$135.26	\$135.87	\$135.26
Direct Trunked Transport Facility/ Mile ESALT 10 Mbps DTF-E1	Circuit Miles	\$85.12	\$85.50	\$85.12
Direct Trunked Transport Facility/ Mile ESALT 10 Mbps DTF-E2	Circuit Miles	\$51.08	\$51.31	\$51.08
Direct Trunked Transport Facility/ Mile ESALT 10 Mbps DTF-E3	Circuit Miles	\$203.33	\$204.24	\$203.33
Direct Trunked Transport Facility/ Mile ESALT 10 Mbps DTF-E4	Circuit Miles	\$417.05	\$418.92	\$417.05
Direct Trunked Transport Facility/ Mile ESALT 50 Mbps DTF-E1	Circuit Miles	\$238.37	\$239.44	\$238.37
Direct Trunked Transport Facility/ Mile ESALT 50 Mbps DTF-E2	Circuit Miles	\$158.91	\$159.62	\$158.91
Direct Trunked Transport Facility/ Mile ESALT 50 Mbps DTF-E3	Circuit Miles	\$664.07	\$667.04	\$664.07
Direct Trunked Transport Facility/ Mile ESALT 50 Mbps DTF-E4	Circuit Miles	\$1,183.48	\$1,188.78	\$1,183.48
Direct Trunked Transport Facility/Termination Voice Grade - Two Wire & Four Wire	Termination	\$24.41	\$24.52	\$24.41
Direct Trunked Transport Facility/Termination High Capacity DS1	Termination	\$59.15	\$59.41	\$59.15
Direct Trunked Transport Facility/Termination High Capacity DS3	Termination	\$379.77	\$381.47	\$379.77
Direct Trunked Transport Facility/Termination Synchronous Optical Channel OC3	Termination	\$395.43	\$397.20	\$395.43
Direct Trunked Transport Facility/Termination Synchronous Optical Channel OC12	Termination	\$860.97	\$864.83	\$860.97
Direct Trunked Transport Facility/Termination ESALT 2 Mbps	Circuit terms	\$78.34	\$78.69	\$78.34
Direct Trunked Transport Facility/Termination ESALT 10 Mbps	Circuit terms	\$95.77	\$96.20	\$95.77
Direct Trunked Transport Facility/Termination ESALT 50 Mbps	Circuit terms	\$117.06	\$117.58	\$117.06
Multiplexing, Per Arrangement DS3 to DS1	Termination	\$346.50	\$348.05	\$346.50
Multiplexing, Per Arrangement DS1 to Voice	Termination	\$133.78	\$134.38	\$133.78
Customer Node Per Node OC3 155.52 Mbps	Port	\$359.70	\$361.31	\$359.70
Customer Node Per Node OC12 622.08 Mbps	Port	\$1,039.14	\$1,043.80	\$1,039.14
Customer Premises Port, Per Port OC3 155.52 Mbps	Port	\$118.04	\$118.57	\$118.04
Customer Premises Port, Per Port STS-1 51.84 Mbps	Port	\$141.72	\$142.35	\$141.72
Customer Premises Port, Per Port DS3 44.736 Mbps	Port	\$141.72	\$142.35	\$141.72
Customer Premises Port, Per Port DS1 1.544 Mbps	Port	\$36.32	\$36.48	\$36.32
Add/Drop Multiplexing Central Office Port, Per Port DS1 1.544 Mbps	Port	\$29.06	\$29.19	\$29.06
Add/Drop Multiplexing Central Office Port, Per Port OC3 155.52 Mbps	Port	\$118.04	\$118.57	\$118.04
Add/Drop Multiplexing Central Office Port, Per Port DS3 44.736 Mbps	Port	\$72.66	\$72.99	\$72.66
Network Blocking, Per Blocked Call Network Blocking, Per Blocked Call, Applies to FGD only	Call	\$0.01660000	\$0.01670000	\$0.01660000
ESALT Real Time CoS/QoS, Per ESALT DTF-E1 Facility ESALT 2 Mbps	Facility	\$6.41	\$6.44	\$6.41



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ESALT Real Time CoS/QoS, Per ESALT DTF-E1 Facility ESALT 10 Mbps	Facility	\$32.07	\$32.21	\$32.07
ESALT Real Time CoS/QoS, Per ESALT DTF-E1 Facility ESALT 50 Mbps	Facility	\$99.73	\$100.18	\$99.73
ESALT Entrance Facility Protection, Per ESALT Entrance Facility ESALT 2 Mbps	Circuit	\$288.40	\$289.69	\$288.40
ESALT Entrance Facility Protection, Per ESALT Entrance Facility ESALT 10 Mbps	Circuit	\$288.40	\$289.69	\$288.40
ESALT Entrance Facility Protection, Per ESALT Entrance Facility ESALT 50 Mbps	Circuit	\$288.40	\$289.69	\$288.40
Common Channel Signaling Network Connect on Signaling Mileage Facility, Per Mile	Mile	\$3.29	\$3.30	\$3.29
Common Channel Signaling Network Connect on Signaling Mileage Termination, Per Termination	Termination	\$32.87	\$33.02	\$32.87
Common Channel Signaling Network Connect on Signaling Entrance Facility, Per Facility	Facility	\$62.99	\$63.27	\$62.99
Common Channel Signaling Network Connect on STP Port, Per Port	Port	\$324.57	\$326.02	\$324.57
Terminating Tandem Switched Transport Terminating Tandem Switched Transport Facility	Minutes / Mile	\$0.00043700	\$0.00043900	\$0.00043700
Terminating Tandem Switched Transport Terminating Tandem Switched Termination	Minutes	\$0.00226700	\$0.00227700	\$0.00226700
Terminating Tandem Switched Transport Terminating Tandem Switching	Minutes	\$0.00571800	\$0.00574400	\$0.00571800
Nonrecurring Charges Voice Grade Two Wire	Facility	\$488.17	\$490.36	\$488.17
Nonrecurring Charges Voice Grade Four Wire	Facility	\$488.17	\$490.36	\$488.17
Nonrecurring Charges High Capacity DS1	Facility	\$358.01	\$359.61	\$358.01
Nonrecurring Charges High Capacity DS3	Facility	\$482.75	\$484.91	\$482.75
Nonrecurring Charges Synchronous Optical Channel OC3	Facility	\$390.54	\$392.29	\$390.54
Nonrecurring Charges Synchronous Optical Channel OC12	Facility	\$390.54	\$392.29	\$390.54
Nonrecurring Charges Interim NXX Translation, Per Order	Order	\$238.67	\$239.74	\$238.67
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	\$479.49	\$481.64	\$479.49
Nonrecurring Charges Trunk Activation, per 24 trunks activated or fraction thereof on a per order basis	Order	\$497.93	\$500.16	\$497.93
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	\$578.57	\$581.16	\$578.57
Nonrecurring Charges ESALT 10 Mbps	Facility	\$578.57	\$581.16	\$578.57
Nonrecurring Charges ESALT 50 Mbps	Facility	\$578.57	\$581.16	\$578.57
Nonrecurring Charges ESALT Direct Trunked Termination, per ESALT Direct Trunked Termination	Order	\$381.18	\$382.89	\$381.18



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installed Nonrecurring Charges ESALT Entrance Facility Protection, per ESALT Entrance Facility	Facility	\$584.82	\$587.44	\$584.82
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Study Area: PEND OREILLE TELEPHONE COMPANY (ID: 522418)
Holding Company: RURAL TELEPHONE CO. (ID: 20000256)

CONNECT AMERICA FUND

[Data to be provided to USAC/FCC in June 2019 for CAF ICC Purposes]

Settlement Type: Cost

Test Period 7/1/19-6/30/20 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 ^ 8)
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 or Estimated Duplicate LSS Costs in CAF II
18	Adjustment for Double Recovery or Corrections
19	Test Period 17/18 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	

REDACTED

26	ARC Revenue Adjustment following "Second Order on Reconsideration & Clarification" FCC 18-13
27	Adjusted Test Period 2019-2020 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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2019 CAF ICC Data Collection

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Logged in User: Samantha Simatos



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

Access Recovery Charges

Recalculate ARC Rates & CAF Support revenues

Test Period 2019-20 Pre-True-up View Test Period 2019-20 Post-True-Up (Filing) View

Test Period 2019-2020 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
Cus ck Ione Metaline Falls Study Area Summary	[REDACTED]									

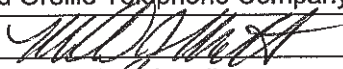
TO BE COMPLETED BY THE REPORTING CARRIER,

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 **Pend Oreille Telephone Company**

Signature of Authorized Officer



Date **05/24/19**

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)

June 17 2019

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 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 05/24/19

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	<u>522418</u>	Filing Due Date for this form (mm/dd/yyyy)	<u>June 17 2019</u>
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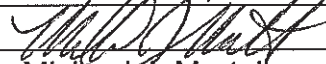
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

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 **Pend Oreille Telephone Company**

Signature of authorized officer  Date **05/24/19**

Printed name of authorized officer **Michael J. Martell**

Title or position of authorized officer **Vice-President**

Telephone number of authorized officer: **(208) 366-2614**

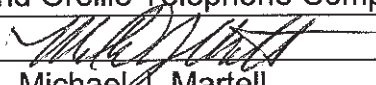
Study Area Code of Reporting Carrier	522418	Filing Due Date for this form (mm/dd/yyyy)	June 17 2019
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Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 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, 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		05/24/19
Printed name of authorized officer				Michael J. Martell			
Title or position of authorized officer				Vice-President			
Telephone number of authorized officer:				(208) 366-2614			
Study Area Code of Reporting Carrier		522418		Filing Due Date for this form (mm/dd/yyyy)		June 17 2019	

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.