

June 14, 2016

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 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, 2016 through June 30, 2017, 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, 2016 through June 30, 2017 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.

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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 written in a cursive style with a horizontal line extending to the right.

Eric Votaw, Senior Manager for
Moss Adams LLP

Enclosures

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



2016 CAF ICC Data Collection

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Home Select Company Main Page Study Area Data Input Menu > CAF & ARC Output > 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 2016-2017 Expected Maximum Intrastate Revenue: ██████████

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	7/1/2016 Interstate Rate	Test Year 2015-2016 Current Intrastate Rate	7/1/2016 Proposed Intrastate Rate	FY 2011 Intrastate Units: Terminating for Non-Dedicated or Originating and Terminating for Dedicated Elements	Intrastate Price-out with 7/1/2016 proposed intrastate rate and FY2011 Demand	FY 2015 Intrastate Units: Terminating for Non-Dedicated and total for Dedicated Elements	Test Year 2016-2017 Forecasted Intrastate Units	Intrastate Units Growth Rate %	TY 2016-17 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										

Redacted

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 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	

Redacted

Customer Premises Port, Per Port DS3 44.736 Mbps	Port	[Redacted]
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 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	Facility	

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Channel OC3		
Nonrecurring Charges Synchronous Optical Channel OC12	Facility	
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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2016 CAF ICC Data Collection

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

Study Area: **PEND OREILLE TEL. (ID: 522418)**
 Holding Company: **RURAL TELEPHONE CO. (ID: 20000256)**

Study Area USAC Reports

[View Printer-friendly report]

2016 USAC Data Report (Test Period 2016-2017)

CONNECT AMERICA FUND

Data to be provided to USAC/FCC in June 2016 for CAF ICC Purposes

Current Settlement Type: Cost

Test Period 7/1/16-6/30/17 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 ^ 5)
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 14/15 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 2016-2017 Pre-True-up View Test Period 2016-17 Post-True-Up (Filing) View

Test Period 2016-2017 Post True-Up (Filing) View

Table with 11 columns: 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. The data row is redacted with a black box.

Redacted

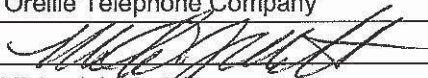
TO BE COMPLETED BY THE REPORTING CARRIER,

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 **05/23/2016**

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)

6/16/2016

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:

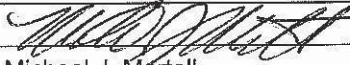
Certification of Officer to Authorize an Agent to File Data Reported on Behalf of Reporting Carrier

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 05/23/2016

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)

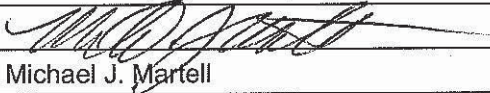
6/16/2016

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	
				05/23/2016	
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)	6/16/2016	

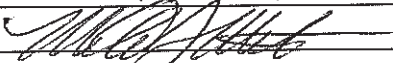
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

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 **05/23/2016**

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)	6/16/2016
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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.

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	07/01/16
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						Cusick	Residential
10						Cusick	Lifeline
11						Ione	Residential
12						Ione	Lifeline
13						Metaline Falls	Residential
14						Metaline Falls	Lifeline

Redacted

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>06/13/16</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>07/01/2016</u>

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		06/13/2016	
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)			07/01/2016			