



Consolidated[®]
c o m m u n i c a t i o n s

DESCRIPTION AND JUSTIFICATION

SUREWEST TELEPHONE

INTERSTATE ACCESS SERVICES

TARIFF FCC No. 1

ANNUAL 2015 PRICE CAP SHORT FORM FILING

May 18, 2015

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SECTION 1 INTRODUCTION AND SUMMARY

Introduction

SureWest Telephone hereby provides a Description and Justification for its limited Tariff Review Plan revisions to F.C.C. Tariff No. 1 along with supporting documentation. This information is being filed in accordance with the Commission's 2015 TRP Notices released March 27, 2015 and April 14, 2015 (DA 15-368 and DA 15-458 respectively) and fulfills the requirements established in Sections 61.41 through 61.49 of the Commission rules.

Description of SureWest Telephone Operations

SureWest Telephone (SWTC) provides local service, toll, private line services, access services, DSL, CLASS services, and other modern telecommunications services to its customers. Effective July 2, 2013, SWTC became a price cap company pursuant to FCC Order DA 13-1253¹ that fall under Sections 61.41 through 61.49 of the Commission's Rules and relevant Commission Orders.² They provide local service, toll, private line services, access services, DSL, CLASS services, and other modern telecommunications services to their customers.

SureWest Telephone is a Roseville, CA based telecommunications company founded in 1914 by William Doyle as the Roseville Telephone Company. SureWest Telephone became the official name in 2003. As an incumbent local exchange carrier (ILEC) operating solely in California, SureWest Telephone's serving territory represents 83 square contiguous miles and includes the communities of Roseville, Citrus Heights, Granite Bay, Rocklin, and Antelope, all located in the greater Sacramento, California region. There, SureWest Telephone ILEC provides basic telephone services serving approximately 35,000 local access lines as of April 30, 2015. With the purchase of WINfirst in 2002 by SureWest Telephone's holding company, SureWest Communications, service was extended and continues to grow in the greater Sacramento region by the SureWest affiliate, SureWest TeleVideo, a competitive local exchange carrier (CLEC) serving the communities of Sacramento, Carmichael, Elk Grove, and Lincoln. SureWest CLEC services provided are telephone, Voice over IP, DSL (15 Mbit/s/1 Mbit/s, 10 Mbit/s/768 kbit/s, 6 Mbit/s/768 kbit/s, 3 Mbit/s/768 kbit/s, 1 Mbit/s/128 kbit/s), FTTH for competitive local exchange carrier areas up to 50 Mbit/s data both ways, IPTV in HD for copper customers with a bonded DSL modem, and IPTV in HD for FTTH customers. In 2008, SureWest Communications acquired Everest Communications in Kansas and Missouri. SureWest Communications now operates in California, Kansas, and Missouri.

¹ See, Order, SureWest Telephone Petition for Conversion from Rate-of-Return to Price Cap Regulation and for Limited Waiver Relief (DA 13-1253, WC Docket No. 13-71)

² See, Order, July 2015 Annual Access Charge Tariff Filings, released March 27, 2015, DA 15-368 ("2015 Filing Order"); and Tariff Review Plans, Material to be filed in support of 2015 Annual filings, DA 15-458, released April 14, 2015 ("2014 TRP Order").

On July 2, 2012, SureWest Communications was acquired by Consolidated Communications Holding, Inc. and SureWest Telephone subsequently became a subsidiary of a Price Cap Holding Company.

SECTION 2 OVERVIEW OF FILING PACKAGE

Tariff Support Material

This support material is submitted pursuant to Part 61.49 of the Federal Communications Commission (Commission) Rules and Regulations and the Order issued in WC Docket No. 15-75, July, 2015 Annual Access Charge Tariff Filings released March 27, 2015, and Tariff Review Plans issued in WC Docket No. 15-75, Material to be Filed in Support of 2015 Annual Access Tariff Filings, released April 14, 2015.

In addition to the description and justification contained in this volume, the following information is submitted to provide specific support data at the proposed tariff level of detail for the Consolidated local operating companies.

Description and Justification

Exhibit 1 – Consolidation Local Operating Companies and Study Area
Designators

Exhibit 2 – Exogenous Cost Changes

Tariff Review Plan (Excel file SWTCas15.xls)

SECTION 3 TARIFF SUPPORT

Determination of Exogenous Changes

In Accordance with the Commission's Rules, Consolidated developed certain exogenous changes for inclusion in the price cap formula. These changes include: (1) North American Number Plan Administration; (2) Regulatory Fees; and (3) Telecommunications Relay Service Fees.

Exogenous cost changes were individually developed for each of the items outlined above, and in the aggregate for all changes. Consolidated used base year 2013 (time of its last tariff filing) to estimate exogenous costs embedded in rates. Consolidated has also normalized the exogenous amounts to reflect any shift in revenue growth. The result is that no exogenous adjustment is made if the support rate has not changed. In other words the rate per line remains unchanged if the factor is unchanged. A brief description of each change follows and a summary of the exogenous changes is shown in Exhibit 2, RDEV-1.

North American Numbering Plan Administration

On June 27, 2001, the Federal Communications Commission release an order approving the compensation plan for the North American Numbering Plan Administration (NANPA) for fiscal year 2001.³ The Commission reviewed and accepted the North American Numbering Plan Administrator submission and ordered that a contribution factor of 0.0000365⁴. This factor is used as an estimate for application to end user revenues of each telecommunications carrier in the United States to fund the program for the 2013 fiscal year (July 2013 to June 2014). The impact of the NANPA support has been included as an exogenous cost in this filing as shown in Exhibit 2, RDEV-1.. No updated factor has been used for this filing.

Regulatory Fees

Earlier Commission decisions⁵ allow local exchange companies to reflect the impact of regulatory fees as an exogenous cost in annual price cap filings. The impact of regulatory fee changes for the July 2012 – June 2013 fiscal year was calculated using a factor of .00343 as prescribed in the Commission's *Regulatory Fee Order*,⁶ and has been used as

³ *In the Matter of Administration of the North American Number Plan*, CC Docket No. 92-237 and *North American Number Plan Cost Recovery Contribution Factor and Fund Size*, NDS File No. L-00-72, Order (DA 01-1524), released June 7, 2001 (NANP Order)

⁴ *In the Matter of Administration of the North American Numbering Plan*, Proposed North American Numbering Plan Administration Fund Size Estimate and Contribution Factor for July 2014 through June 2015 (filed June 13, 2014) Public Notice, DA 14-792, CC Docket No. 92-237.

⁵ *Price Cap Treatment of Regulatory Fees Imposed by Section 9 of the Communications Act*, 9 FCC 6060 (1994), erratum (November 2, 1994).

⁶ *In the Matter of Assessment and Collection of Regulatory Fees for Fiscal Year 2014*, Report and Order, (filed August 29, 2014) FCC Order 14-129, MD Docket 14-92 (*Regulatory Fee Order*).

an estimate and included as an exogenous cost in this filing and is shown in Exhibit 2, RDEV-1. In addition, because of the timing of last year's regulatory fee order, CCC elected to leave its last annual filing unchanged and reflect the difference in this year's filing. Because of this event, it is now necessary to normalize the exogenous rate over the full year thereby reversing the accelerated ratemaking. This exogenous allocation can be seen in RDEV-1, Page 2 of 2.

Telecommunications Relay Service

The Americans with Disabilities Act (ADA) required that all common carriers providing interstate voice telecommunications provide Telecommunications Relay Service (TRS) to customers effective July 26, 1993. In its *Third Report and Order* in CC Docket No. 90-571,⁷ the Commission required that all common carriers providing interstate telecommunications services contribute to an interstate shared fund to support the TRS function. The impact of the TRS exogenous cost for this filing is calculated using the factor of .01219 as prescribed in the Commission's revised *TRS Order*⁸ and is displayed on Exhibit 2 , RDEV-1. This exogenous allocation can be seen in RDEV-1, Page 2 of 2.

⁷ In the *Matter of Telecommunications Relay Services and the Americans with Disabilities Act of 1990*, Third Report and Order, CC Docket No. 90-571, released July 20, 1993 (*Third Report and Order*).

⁸In the *Matter of Telecommunications Relay Services and Speech to Speech Services for Individuals with Hearing and Speech Disabilities* Notice of Proposed Rulemaking, (filed June 30, 2014, DA 14-946, CG Docket 03-123 (*TRS Order*)).

Exhibit 1

Consolidated Communications Operating Companies and Study Area Designators

**Consolidated Communications Operating Companies
And Study Areas**

Operating Company

COSA

SureWest Telephone

SWTC

Exhibit 2

Exogenous Cost Changes

