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March 31, 2016

Transmittal No. 1455 - Amended

Secretary
Federal Communications Commission
Washington, D.C. 20554

Attention: Wireline Competition Bureau

The accompanying tariff material, issued on behalf of the National Exchange Carrier Association, Inc. (NECA) bearing Tariff F.C.C. No. 5, Access Service, is sent to you for filing in compliance with the Communications Act of 1934, as amended.

With this filing, NECA is amending Transmittal No. 1455 to submit an updated Tariff Review Plan (TRP) Connect America Fund Intercarrier Compensation (CAF ICC) spreadsheet file, as described below. NECA is also amending Transmittal No. 1455 to submit files containing exhibits in Volume 1 of its supporting documentation to update certifications for the carriers identified below.

Transmittal No. 1455 was originally filed on June 16, 2015, amended on June 24, 2015 and September 16, 2015, and became effective on July 1, 2015. As part of the cost support for Transmittal No. 1455, NECA submitted the required TRP CAF ICC spreadsheet files for the 2015-2016 tariff test period.

This amendment contains a number of data corrections and adjustments for the following companies and is made following discussions with and reflecting direction received from Commission staff members.

While reviewing its 2015-2016 CAF ICC data, Arthur Mutual Telephone Company (SAC 300586 - OH) determined the amount of its FY2011 intrastate terminating revenue and resulting CAF ICC support were overstated and needed to be adjusted downward.

The attached updated TRP CAF ICC spreadsheet files also include an increase in the FY2011 intrastate terminating revenue and resulting CAF ICC support for Western Wahkiakum County Telephone Company (SAC 522451 - WA) to include eligible revenues and exclude ineligible revenues discovered during a subsequent review of its 2015-2016 CAF ICC data.

This amendment includes adjustments to the TY 2012-2013 and TY 2013-2014 Eligible Recovery Refund amounts for Blanca Telephone Company (SAC 462182 - CO) to reflect the refund to USAC of the company's over-recovery of CAF ICC support.

Finally, this filing amends Transmittal No. 1455 to resubmit the files containing updated Volume 1, Appendix D, Exhibit 1 Carriers not Seeking Duplicative Recovery; Exhibit 2 Carrier Eligibility for CAF/ICC Recovery; and Exhibit 3 Accuracy of CAF ICC Data certifications for the above listed companies. No changes were made to other companies' certifications previously submitted in these volumes.

This filing includes data to support NECA's calculation of each Telephone Company's Eligible Recovery, ARC rates and revenues, and estimated CAF ICC support. As was the case with the confidential TRP CAF ICC data file originally transmitted on June 16, 2015 under Transmittal No. 1455, NECA seeks confidential treatment of this data pursuant to the *Protective Order* designated for use in the 2015 Annual Access Tariff Filings proceeding.¹

Accordingly, the confidential data file has been marked, "**CONTAINS PRIVILEGED AND CONFIDENTIAL INFORMATION – DO NOT RELEASE (PER DA 15-616 PROTECTIVE ORDER)**." Attachment A of this Transmittal Letter contains detailed information regarding NECA's request for confidential treatment. This filing also includes a redacted version of the file identified in Attachment A marked, "**REDACTED – FOR PUBLIC INSPECTION**."

Attachment B to this transmittal includes the listing of FCC Registration Numbers (FRNs) for the Telephone Companies on whose behalf this filing is being made.

In compliance with Section 61.14 of the Commission's Rules, the amended transmittal and associated files are being transmitted electronically today via the Commission's Electronic Tariff Filing System.

All correspondence and inquiries concerning this filing should be directed to me at the above address or faxed to 973-599-6612.

Jennifer Leonard

Attachments

Attachment A

Attachment B

Volume 1 Appendix D:

Vol1ExhibitsA.pdf

Vol1ExhibitB.pdf

Vol1ExhibitsC.pdf

Vol1ExhibitsD.pdf

Vol1ExhibitsE.pdf

Vol1ExhibitsF.pdf

TRPText.pdf

TRPExhibits.xls

TRPCAFICC_Confidential.xlsx

TRPCAFICC_Public.xlsx

¹ See *Procedures for Obtaining Confidential Information from 2015 Annual Access Charge Tariff Filings*, Public Notice Attachment, WC Docket No. 15-75, 30 FCC Rcd 4917 (2015) (*Protective Order*).

Request for Confidential Treatment

NECA seeks confidential treatment under the *Protective Order* designated for use in this proceeding¹ for the data provided in the file identified below. This data is filed electronically via ETFS as part of the Tariff Review Plan for NECA's Tariff F.C.C. No. 5 filing, made under Transmittal No. 1455. This data is required by the Commission to monitor rate of return exchange carrier compliance² with rules regarding the revenue recovery mechanism³ for revenue lost due to mandatory access rate reductions.

Pursuant to the terms of the *Protective Order*, signed declarations requesting access to the confidential information should be sent to the attention of Jennifer Leonard, NECA Director Access Tariffs & Costs, via email to Tariff5@neca.org or via facsimile at 973.599.6612. NECA will provide electronic copies of the un-redacted files to Authorized Representative(s).⁴ NECA designates 80 South Jefferson Rd. Whippany, NJ 07981 and 1634 I (Eye) St., NW, Suite 510, Washington, D.C. 20006 as its public inspection locations.

Notwithstanding the *Protective Order*, the information provided in the file listed below is entitled to confidential, non-public treatment under the Freedom of Information Act (FOIA) and related provisions of the Commission's rules.⁵ The information satisfies the requirement of FOIA Exemption 4 (trade secrets or commercial/financial information).

NECA submits the following information pursuant to section 0.459 in support of its request for confidential treatment of the data in the identified file.

- Identification of the specific information for which confidential treatment is sought:

NECA seeks confidential treatment for certain information in the following file, which contains confidential and proprietary financial information of NECA Traffic Sensitive (TS) tariff participants:

TRPCAFICC_Confidential.xlsx

This information includes actual revenues, revenue requirement data and demand for the 2011 fiscal year; trued-up revenues and cost data for the 2013-2014 test period; projections of revenues, cost data and demand for the 2012-2013, 2013-2014, 2014-2015 and 2015-2016 test periods; and the product of calculations made using the confidential data.

¹ See *Procedures for Obtaining Confidential Information from 2015 Annual Access Charge Tariff Filings*, Public Notice Attachment, WC Docket No. 15-75, 30 FCC Rcd 4917 (2015) (*Protective Order*).

² 47 U.S.C. § 51.919(b).

³ 47 U.S.C. § 51.917.

⁴ See *Protective Order*, ¶ 1.a.

⁵ 47 C.F.R. §§ 0.457 and 0.459; 5 U.S.C. § 552, et. seq.

The data includes information on interstate access, intrastate access, reciprocal compensation, VoIP and fees quantified at the study area and/or exchange area level that was used by NECA to calculate each exchange carrier's Eligible Recovery and ARC rates.

- Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission:

This information is filed electronically via ETFS in conjunction with NECA Tariff F.C.C. No. 5, Annual Access Charge Filing, Transmittal No. 1455 in WC Docket No. 15-75.

- Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged:

The information in the file contains sensitive study area-specific and exchange area-specific information for NECA TS tariff participants as required by Commission rules for monitoring compliance with the CAF ICC recovery mechanism. At the study area and exchange level, the information is granular and highly confidential to the reporting TS tariff participants. The financial data is treated as a confidential trade secret by TS tariff participants.

- Explanation of the degree to which the information concerns a service that is subject to competition:

Rural telephone service has historically lent itself to "cherry picking" by competitors that choose to serve only the low cost areas within a study area. Detailed information about revenues, expenses, and demand may help prospective competitors to gain insight to incumbent LEC (ILEC) market strategies and gain competitive advantage.

- Identification of any measures taken by the submitting party to prevent unauthorized disclosure:

The information provided in the file is maintained on a confidential basis and made available only to NECA representatives on a need to know basis. Any public information is only made available on an aggregate basis.

- Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties:

The information in the identified file is not publicly available.

- Justification of the period during which the submitting party asserts that material should not be available for public disclosure:

NECA requests that all TS tariff participant data provided in the TRP file identified above be treated as confidential indefinitely. Because of the sensitive nature of the data, it would not be appropriate for public disclosure at any time in the foreseeable future.

The *Protective Order* places additional requirements on Authorized Representative(s) to destroy or return all confidential information, as well as copies and derivative materials, within two weeks after final resolution of this proceeding.⁶

- Any other information that the party seeking confidential treatment believes may be useful in assessing whether its request for confidentiality should be granted:

NECA is submitting this information on behalf of the ILECs that participate in NECA's TS tariff. The Commission should take care to not deprive those ILECs of the opportunity to speak for themselves in the event of a FOIA request for access to data. NECA requests that the Commission notify carriers of any FOIA request and allow them to be given a reasonable opportunity to file detailed information supporting continued confidential treatment of their respective data.

Accordingly, NECA requests confidential treatment of the member data provided in the file identified above pursuant to section 0.457 and 0.459 of the Commission's rules and paragraph 2 of the *Protective Order*. Pursuant to the *Protective Order*, NECA has marked each page of the non-redacted version of the identified file as follows:

**CONTAINS PRIVILEGED AND CONFIDENTIAL INFORMATION – DO NOT
RELEASE (PER DA 15-616 PROTECTIVE ORDER)**

NECA has also complied with the requirement of the *Protective Order* for providing a redacted copy of the file identified above, which is marked: **REDACTED – FOR PUBLIC INSPECTION**.

⁶ See *Protective Order*, ¶ 14.

FCC Registration Number for Tariff 5 Participants

0001646454	0003741949	0004269833	0002645927
0002645927	0002756187	0002756187	0002756187
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0003764735	0004924809	0004924809	0015034358
0003745940	0003745940	0003745940	0002432672
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0002723773	0002723732	0002587491	0004329314
0002926772	0003757374	0001570936	0001772888
0001602663	0003732302	0003778594	0003746542
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0003773991	0001631084	0001585397	0001701275

FCC Registration Number for Tariff 5 Participants

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FCC Registration Number for Tariff 5 Participants

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FCC Registration Number for Tariff 5 Participants

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FCC Registration Number for Tariff 5 Participants

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FCC Registration Number for Tariff 5 Participants

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0001667765	0004338463	0003740008	0001583194
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0001724426	0003774478	0003774494	0003727385
0003756590	0003756590	0003744141	0003772993
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FCC Registration Number for Tariff 5 Participants

0001678804
0004985065
0004328134

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0004983896

0001581974
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