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January 17, 2017

Transmittal No. 1503 - 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. 1503 to submit updated Tariff Review Plan (TRP) Connect America Fund Inter-carrier Compensation (CAF ICC) and Connect America Fund Broadband-Only Loop Support (CAF BLS) spreadsheet files, as described below. NECA is also amending Transmittal No. 1503 to submit files containing updated certifications for the carriers identified below.

Transmittal No. 1503 was originally filed on December 19, 2016 and became effective on January 3, 2017. As part of the cost support for Transmittal No. 1503, NECA submitted the required TRP CAF ICC and CAF BLS spreadsheet files for the 2016-2017 tariff test period.

On December 21, 2016, the Wireline Competition Bureau (WCB) released an Order granting in part, subject to identified conditions, four petitions seeking waiver of certain recovery rules to enable the requesting carriers to include in their recovery calculations the funds they were unable to collect from a carrier customer due to an access avoidance scheme and subsequent bankruptcy.¹ Specifically, the WCB permitted the requesting carriers to include in their ICC Base Period Revenue unpaid amounts billed to Halo Wireless, Inc. for intrastate usage, and, in some cases, net reciprocal compensation usage during Fiscal Year 2011 provided each carrier certify to five conditions that ensure the adjustments comply with Commission rules.²

¹ See Connect America Fund, Developing a Unified Inter-carrier Compensation Regime, Petitions for Waiver of Section 51.917(b)(7) of the Commission's Rules, WC Docket No. 10-90 and CC Docket No. 01-92, Order, DA 16-1417 (rel. Dec. 21, 2016), ¶ 1 (*Halo Order*).

² *Id.* at ¶ 18.

As a result, this amendment includes updated TRPCAFICC_Confidential.xlsx files for the following companies consistent with the requirements of the Commission's *Halo Order*:

<u>Company</u>	<u>State</u>	<u>Study Area</u>
Blountsville Telephone LLC	AL	250282
Brantley Telephone Company, Inc.	GA	220347
Chouteau Telephone Company	OK	431981
FairPoint Communications Missouri, Inc.	MO	421472
GTC, Inc.	FL	210291
Hopper Telecommunications LLC	AL	250300
Orwell Telephone Company	OH	300649
Palmetto Rural Telephone Cooperative	SC	240536
PBT Telecom, Inc.	SC	240539
Pembroke Telephone Company, Inc.	GA	220376
Pine Belt Telephone Company, Inc.	AL	250315
Pineland Telephone Cooperative, Inc.	GA	220377
Public Service Telephone Company	GA	220381
Waverly Hall Telephone L.L.C.	GA	220392

The data required by the *Halo Order* at paragraph 25 is included as separate tabs labeled "DA 16-1417 Data" and "DA 16-1417 Cites" in the above files.

This amendment also includes changes to imputed ARC revenue amounts reflected in the TRPCAFICC_Confidential.xlsx files resulting from changes in the number of projected broadband-only loops for James Valley Cooperative Telephone Company (SD 391664), Clear Lake Independent Tel. Co. (IA 351132), Oklatel Communications, Inc. (OK 432013) and Ventura Telephone Company, Inc. (IA 351322).

This amendment also includes an update to the TRPCAFBLS_Confidential.xlsx file to reflect updated CBOL demand and revenue data for James Valley Cooperative Telephone Company (SD 391664), Clear Lake Independent Tel. Co. (IA 351132), Oklatel Communications, Inc. (OK 432013), Ventura Telephone Company, Inc. (IA 351322), and Molalla Telephone Company (OR 532383).

Finally, this filing amends Transmittal No. 1503 to resubmit the files containing updated Appendix A (Accuracy of CAF ICC Data certifications) and Appendix B (Accuracy of CAF BLS Data) certifications and submits a new Appendix C, which includes Carrier Eligibility for CAF/ICC Recovery, Carriers not Seeking Duplicative Recovery and Halo Order certifications for companies impacted by the *Halo Order*. No changes were made to other companies' certifications previously submitted in these appendices.

This filing includes data to support NECA's calculation of each company's Eligible Recovery, ARC rates and revenues, and estimated support for CAF ICC and CAF BLS. As was the case with the confidential TRP CAF ICC and CAF BLS data files originally transmitted on December 19, 2016 under Transmittal No. 1503, NECA seeks confidential treatment of this data pursuant to the *Protective Order* designated for use in the Access Charge Tariff Filings Introducing Broadband-Only Loop Service proceeding.³

Accordingly, the confidential data files have been marked, "**CONTAINS PRIVILEGED AND CONFIDENTIAL INFORMATION – DO NOT RELEASE (PER DA 16-1249) PROTECTIVE ORDER**." Attachment A of this Transmittal Letter contains detailed information regarding NECA's

³ See Procedures for Obtaining Confidential Information From Access Charge Tariff Filings Introducing Broadband-Only Loop Service, Public Notice Attachment, WC Docket No. 16-317, 31 FCC Rcd 11982 (2016)(*Protective Order*).

request for confidential treatment. This filing also includes a redacted version of the files 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 transmittal, associated files, required Form 159 and \$925.00 filing fee 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

TRPCAFICC_ConfidentialA.xlsx

TRPCAFICC_ConfidentialB.xlsx

TRPCAFICC_ConfidentialC.xlsx

TRPCAFBLS_Confidential.xlsx

AppendixA1.pdf

AppendixB.pdf

TRPCAFICC_PublicA.xlsx

TRPCAFICC_PublicB.xlsx

TRPCAFICC_PublicC.xlsx

TRPCAFBLS_Public.xlsx

AppendixA2.pdf

AppendixC.pdf

Request for Confidential Treatment

NECA seeks confidential treatment under the *Protective Order* designated for use in the Access Charge Tariff Filings Introducing Broadband-Only Loop Service proceeding.¹ 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. 1503. 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 and with the Commission's universal service mechanisms reforms for rate of return carriers.⁴

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 Senior 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).⁵ 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 files listed below are entitled to confidential, non-public treatment under the Freedom of Information Act (FOIA) and related provisions of the Commission's rules.⁶ 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 files.

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

NECA seeks confidential treatment for certain information in the following files, which contain confidential and proprietary financial information of NECA Common Line (CL) and Traffic Sensitive (TS) tariff participants:

TRPCAFICC_ConfidentialA.xlsx
TRPCAFICC_ConfidentialB.xlsx
TRPCAFICC_ConfidentialC.xlsx
TRPCAFBLS_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, 2015-2016 and 2016-2017 test periods; and the product of calculations made using the confidential data.

¹ See Procedures for Obtaining Confidential Information From Access Charge Tariff Filings Introducing Broadband-Only Loop Service, Public Notice Attachment, WC Docket No. 16-317, 31 FCC Rcd 11982 (2016)(*Protective Order*).

² 47 U.S.C. § 51.919(b).

³ 47 U.S.C. § 51.917.

⁴ 47 U.S.C. § 54.901.

⁵ See *Protective Order*, ¶ 7.

⁶ 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.

This data also includes information on projected Consumer Broadband-Only Loops, ARC revenues, SLC lines, Special Access Revenue Requirements, shifted costs, and CAF BLS Broadband-Only support for the 2016/2017 test period.

- 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, Broadband-Only Loop Service Filing, Transmittal No. 1503 in WC Docket No. 16-317.

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

The information in the files contains sensitive study area-specific and exchange area-specific information for NECA CL and 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 CL and TS tariff participants. The financial data is treated as a confidential trade secret by CL and 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 files 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 files 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 CL and TS tariff participant data provided in the TRP files 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.⁷

- 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 CL and 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 files 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 16-1249 PROTECTIVE ORDER)**

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

⁷ 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
0002432672	0007196207	0004334934	0003732633
0022150361	0022150361	0002073526	0001726488
0002723773	0002723732	0002587491	0004329314
0002926772	0003757374	0001570936	0001772888
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0004311528	0004379715	0004379723	0004379749
0004379707	0004379731	0003744570	0004329330
0002650240	0001582485	0001582485	0004056248
0001951144	0004365276	0004328654	0003722949
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0002771228	0004319737	0003723640	0003749736
0004335816	0001565829	0004339800	0004339784
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0003770534	0001715937	0001715937	0004341855
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0004473682	0001700186	0005067228	0004330908
0003716255	0004330965	0003795697	0003749819
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0002504298	0001961416	0001855337	0004374187

FCC Registration Number for Tariff 5 Participants

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FCC Registration Number for Tariff 5 Participants

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0003723699	0002589604	0003740701	0003708104
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0003738739	0003707874	0004246898	0002594976
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FCC Registration Number for Tariff 5 Participants

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0002639870	0002639870	0003767308	0003713955
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FCC Registration Number for Tariff 5 Participants

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0001700863	0001565316	0001615889	0004330890
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0003733839	0001732668	0003767894	0003748522
0003748589	0003744125	0003731817	0001623818
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0003775244	0003723681	0004330007	0003738309
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0001559798	0001607829	0003727575	0003757838
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0003727211	0005065552	0005017439	0004274007
0001960962	0004329652	0003740222	0004314050
0001562388	0002549665	0003717949	0003767522
0004326070	0002502243	0001616390	0002592921
0003767605	0002592897	0001569466	0003723236
0003723236	0002901833	0003757788	0001952605

FCC Registration Number for Tariff 5 Participants

0001952605	0002901817	0002901791	0002924777
0001649847	0003772753	0003757564	0004924478
0003744406	0002924751	0011458999	0001772805
0003724705	0004330353	0001773779	0003767654
0004320412	0003722758	0004331047	0003738275
0002926582	0003735867	0004326872	0004112835
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0003749587	0001601996	0006662423	0003740446
0004374153	0005010996	0005010996	0005069232
0003434958	0003716263	0004339404	0003729316
0003729316	0003774430	0005069323	0003744463
0004325429	0002897064	0001912138	0002430916
0003774379	0003412871	0001675461	0003740628
0001773670	0002334407	0002647287	0004533105
0004338026	0003731940	0004333639	0002717031
0001630201	0002592665	0002477503	0002335099
0005069299	0001571561	0001571561	0005078258
0004927802	0018570812	0002716991	0003770815
0001685718	0001603042	0004966354	0002430510
0003733599	0004269718	0002592640	0003758109
0002924629	0004984670	0002557742	0003784477
0003784477	0004976494	0003646213	0002713626
0003767696	0003749611	0004976932	0002058261
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0004331070	0004333043	0002586998	0002589307
0002592426	0001886977	0002645612	0002592392
0001792621	0001792621	0002592384	0003686821
0003742343	0004382545	0002430163	0002477651
0002477651	0005063045	0002009405	0003723723
0004278453	0002722049	0002590073	0001667765
0003740008	0001583194	0001644798	0003785300
0004969093	0003767969	0002333672	0004321451
0001616192	0002643799	0003774460	0001857598
0003718426	0004939864	0001888155	0002334555
0004329470	0003722907	0005067665	0002590057
0002590057	0002648657	0001724426	0003774478
0003774494	0003727385	0003756590	0003756590
0003744141	0003772993	0004073680	0002590032
0025531955	0003724655	0025093154	0001678804
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0004983896	0004948253	0004328134	