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February 14, 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 Broadband-Only Loop Support (CAF BLS) spreadsheet files, as described below.

Transmittal No. 1503 was originally filed on December 19, 2016, amended on January 17, 2017, amended on January 25, 2017, 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 TRP CAF BLS spreadsheet files for the 2016-2017 tariff test period.

On December 14, 2016, the Wireline Competition Bureau released an Order<sup>1</sup> granting a limited waiver of sections 69.311 and 69.416 when use of the surrogate cost methodology results in a consumer broadband-only loop (CBOL) revenue requirement materially larger than actual broadband-loop costs. The following companies have elected to lower their surrogate loop cost data resulting in lower calculated maximum CBOL rates. Each company has chosen to either tariff its updated calculated maximum CBOL rate or a lower rate as permitted under the Commission's rules.

<u>Company Name</u>	<u>State</u>	<u>Study Area</u>
3 Rivers Telephone Cooperative, Inc.	MT	482255
All West Communications, Inc.	WY	512290
Benton Ridge Telephone Company	OH	300590
Churchill County Telephone & Telegraph		
System d/b/a CC Communications	NV	552349
Colo Telephone Company	IA	351134
Custer Telephone Cooperative, Inc.	ID	472218
Filer Mutual Telephone Company	ID	472220
Hayneville Telephone Company, Inc.	AL	250299

<sup>1</sup> See Connect America Fund, et al, WC Docket No. 10-90, et al, Order, 31 FCC Rcd 13153 (2016).

Kaplan Telephone Company	LA	270432
Lavaca Telephone Company	AR	401704
Missouri Valley Communications, Inc.	ND	382247
Moundville Telephone Company	AL	250307
Nemont Telephone Cooperative, Inc.	ND	382247
Nemont Telephone Cooperative, Inc.	MT	482247
Northwestern Indiana Tel. Co.	IN	320800
Panhandle Telephone Cooperative, Inc.	OK	432016
Preston Telephone Company	IA	351276
Project Telephone Company, Inc.	MT	482250
Rainbow Telecommunications Association, Inc.	KS	411820
Sacred Wind Communications, Inc.	NM	493403
Sierra Telephone Company, Inc.	CA	542338
Siskiyou Tel. Co.	CA	542339
Valley Telephone Cooperative, Inc.	TX	452159
Washington County Rural Tel. Coop., Inc.	IN	320834

This amendment also includes an update to the TRPCAFBLS\_Confidential.xlsx file to reflect updated CBOL demand and revenue data for the following companies:

<u>Company Name</u>	<u>State</u>	<u>Study Area</u>
Cheyenne River Sioux Tribal Telephone Authority	SD	391647
Consolidated Telcom	ND	381607
Corn Belt Telephone Company	IA	351141
Miles Coop. Tel. Assoc.	IA	351242
Ottoville Mutual Telephone Company	OH	300650

Coincident with this amendment, NECA is filing tariff revisions today under Transmittal No. 1508 to introduce new or revise existing CBOL rates for the companies listed in the tables above.

Finally, this filing amends Transmittal No. 1503 to resubmit the file containing updated Appendix B (Accuracy of CAF BLS Data) certifications for those companies which provided new or updated CBOL demand. No changes were made to other companies' certifications previously submitted in this appendix. This filing also resubmits the Connect America Fund Inter-carrier Compensation (CAF ICC) spreadsheet files.

As was the case with the confidential TRP CAF ICC and TRP 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.<sup>2</sup>

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 request for confidential treatment. This filing also includes a redacted version of the files identified in Attachment A marked, **“REDACTED – FOR PUBLIC INSPECTION.”**

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<sup>2</sup> 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*).

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

TRPCAFICC\_ConfidentialA.xlsx

TRPCAFICC\_ConfidentialB.xlsx

TRPCAFICC\_ConfidentialC.xlsx

TRPCAFBLS\_Confidential.xlsx

AppendixB.pdf

TRPCAFICC\_PublicA.xlsx

TRPCAFICC\_PublicB.xlsx

TRPCAFICC\_PublicC.xlsx

TRPCAFBLS\_Public.xlsx

### 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.<sup>1</sup> 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 compliance<sup>2</sup> with rules regarding the revenue recovery mechanism<sup>3</sup> for revenue lost due to mandatory access rate reductions and with the Commission's universal service mechanisms reforms for rate of return carriers.<sup>4</sup>

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](mailto:Tariff5@neca.org) or via facsimile at 973.599.6612. NECA will provide electronic copies of the un-redacted files to Authorized Representative(s).<sup>5</sup> 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.<sup>6</sup> 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.

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<sup>1</sup> 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*).

<sup>2</sup> 47 U.S.C. § 51.919(b).

<sup>3</sup> 47 U.S.C. § 51.917.

<sup>4</sup> 47 U.S.C. § 54.901.

<sup>5</sup> See *Protective Order*, ¶ 7.

<sup>6</sup> 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.<sup>7</sup>

- 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**.

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<sup>7</sup> See *Protective Order*, ¶ 14.

## FCC Registration Number for Tariff 5 Participants

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0002432672	0007196207	0004334934	0003732633
0022150361	0022150361	0001726488	0002723773
0002723732	0002587491	0004329314	0002926772
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0004379723	0004379749	0004379707	0004379731
0004329330	0001582485	0001582485	0004056248
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0004156139	0003766714	0003745825	0002771228
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## FCC Registration Number for Tariff 5 Participants

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0001593938	0002592517	0005069372	0002387868
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0004380952	0003722188	0004321733	0002332930
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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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0004112835	0002388684	0004930350	0003749587
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0004374153	0005010996	0005010996	0005069232
0003434958	0003716263	0004339404	0003729316
0003729316	0004984845	0003774430	0005069323
0003744463	0004325429	0001912138	0002430916
0003774379	0003412871	0001675461	0003740628

## FCC Registration Number for Tariff 5 Participants

0001773670	0002334407	0004533105	0004338026
0003731940	0002717031	0001630201	0002592665
0002477503	0002335099	0005069299	0001571561
0001571561	0005078258	0004927802	0018570812
0003770815	0001685718	0001603042	0004966354
0002430510	0003733599	0004269718	0002592640
0003758109	0002924629	0004984670	0002557742
0003784477	0003784477	0004976494	0003646213
0002713626	0003767696	0003749611	0004976932
0001549914	0004333266	0004327219	0004956652
0004957528	0001730126	0003749645	0003746088
0005057328	0003686888	0003936994	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
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