# Description and Justification

Herein, Hawaiian Telcom, Inc. provides the Description and Justification related to its annual access tariff filing, Tariff Review Plan and related support data and to the filings required by the *USF/ICC Transformation Order*[1] to develop its Access Recovery Charges. Section 1 addresses Hawaiian Telcom's annual access tariff filing, and Section 2 addresses its filings pursuant to the *USF/ICC Transformation Order*.

## 1.0 INTRODUCTION

Hawaiian Telcom, Inc. ("Hawaiian Telcom") hereby submits its Tariff Review Plan (TRP) and the necessary support data as required by the Commission[2] and in compliance with Sections 61.41 through 61.49 of the Commission's Rules. Also, attached are Hawaiian Telcom's Forms 492A[3] (Figure 3) for calendar years 2015 and 2016.

This filing reflects the effects of the exogenous cost adjustments related to Telecommunications Relay Service ("TRS"), Regulatory Fee Obligations, and North American Numbering Plan Administration ("NANPA"). The exogenous cost methodology used in this filing has not

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[1] *Connect America Fund et al*., WC Docket No. 10-90 et al., Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161, (November 18, 2011).

[2] In the Matter of Material to be Filed in Support of 2017 Annual Access Tariff Filings ("TRP Order"), DA 17-386, released April 24, 2017.

[3] Hawaiian Telcom's FCC 492A for reporting calendar year 2015 (Final Report) and for calendar year 2016 were submitted on April 1, 2017.

changed from that used last year. The methodology continues to reflect the exclusion of advanced services.

The total impact on indices of the exogenous cost adjustments in this filing is an increase of $95,733.

## 1.1 DESCRIPTION AND JUSTIFICATION

The Commission's Price Cap Plan employs a combination of caps on aggregates of service rates ("baskets") and maximum limits on prices in individual service categories ("bands"). Under this plan, Hawaiian Telcom services subject to price cap regulation are grouped into two baskets:

(1) Common Line
(2) Special Access

The Common Line basket includes adjustments for USAC Receipts.

The Special Access Basket is also subject to individual service-specific price bands. The Special Access Basket of Hawaiian Telcom contains four service bands:

(1) Voice Grade, Metallic, Telegraph, and WATS
(2) Program Audio and Video
(3) High-Cap/Digital Data Services (includes DDS and Other HiCap, DS1 and DS3).

For each basket of services, the Price Cap Plan places a ceiling on the aggregate revenue-weighted price changes.

No new services were introduced in 2016 (Figure 2).

## 1.2 COMPLIANCE WITH INDICES

In this filing, the Commission requires Hawaiian Telcom to compute the appropriate adjustments to the Price Cap Index (PCI) or Common Line / Marketing / Transport Interconnection Charge (CMT), as appropriate, for each Price Cap basket.[4] The PCI calculations are set forth in the Tariff Review Plan, Form PCI-1. The sources for the existing indices are found in Figure 1, IND-1 References. Proposed indices for the special access basket and its individual service bands are included in the Tariff Review Plan, Form IND-1.

### 1.3 EXOGENOUS COST CHANGES

In this filing, Hawaiian Telcom proposes three exogenous cost adjustments.

The three adjustments are for:

1. Regulatory Fees
2. Telecommunications Relay Service
3. NANPA

The Price Cap portion of these exogenous cost amounts is summarized in the Exogenous Cost Allocations Workpaper.

#### 1.3.1 ALLOCATION OF EXOGENOUS COST CHANGES TO PRICE CAP BASKETS

The Price Cap Regulatory Fee, TRS, and NANPA amounts are allocated to the Common Line and Special Access Baskets based on 499-A[5] end user revenues. The allocation of the incremental exogenous cost changes to these Price Cap baskets is shown on the Exogenous Cost Allocations Workpaper.

[4] See 47 C.F.R. §§ 61.43, 61.45

[5] Hawaiian Telcom's 2016 Form 499-A Telecommunications Reporting Worksheet (Reporting Calendar Year 2016 Revenues), filed April 1, 2017.

### 1.3.2 FCC REGULATORY FEES

The FCC Regulatory Fee exogenous cost changes were calculated by determining the difference between the Regulatory Fees based on 2015 revenues and those based on 2016 revenues at the rate published *In the Matter of Assessment and Collection of Regulatory Fees for Fiscal Year 2017*, FCC 17-62, MD Docket No. 17-134 released May 23, 2017.

#### 1.3.2.1 CALCULATION OF FCC REGULATORY FEES

The first step for calculating the total company preliminary amount of FCC regulatory fees for the tariff period 2017 through 2018 was to determine the adjusted total end user interstate price cap revenues for 2016 from Hawaiian Telcom's Form 499-A. The revenues were multiplied by the regulatory fee factor of 0.00302 per FCC 17-62, MD Docket 17-134. The current amount in rates from the 2016/2017 tariff period was then subtracted from this amount.

The Exogenous Cost Allocations Workpaper displays the calculation of the Regulatory Fee Obligation, as well as the amount allocated to Common Line and Special Access services. The total Price Cap FCC Regulatory Fee exogenous cost adjustment is a decrease of $20,790 in this filing of which $19,227 is allocated to Common Line and $1,563 is allocated to Special Access.

### 1.3.3 TELECOMMUNICATIONS RELAY SERVICE (TRS)

The TRS exogenous cost change was calculated by determining the difference between the TRS contribution obligation in the current tariff rates and the estimated TRS contribution factor for the 2017/2018 tariff period. Because the Commission has not yet finalized a new TRS factor, Hawaiian Telcom has used the factor proposed by the Commission for the 2017/2018 Tariff

Period. The TRS factor of 0.02244 for the 2017/2018 tariff period was proposed on June 2, 2017 in *Rolka Loube Associates Submits Interstate Telecommunications Relay Services Fund Payment Formula and Fund Size Estimate Supplemental Submission, CG Docket Nos. 03-123 & 10.51.*

### 1.3.3.1 CALCULATION OF TRS FUND CONTRIBUTIONS

Hawaiian Telcom calculated the TRS exogenous amounts by calculating the difference between the TRS exogenous cost amount included in the price cap filing for the 2016/2017 tariff period and 2016 adjusted 499-A price cap end user interstate revenues multiplied by the proposed rate of 0.02244. The Exogenous Cost Allocations Workpaper shows the amounts allocated to Common Line and Special Access services. The total Price Cap TRS Fund exogenous cost adjustment is an increase of $116,793 in this filing, of which $108,013 is allocated to Common Line and $8,780 is allocated to Special Access.

### 1.3.4 NORTH AMERICAN NUMBERING PLAN ADMINISTRATION

The NANPA contributions were calculated by determining the difference between the NANPA contribution obligation in the current tariff rates and the estimated NANPA contribution required for the 2017/2018 tariff period. Because the Commission has not yet proposed or finalized a new NANPA factor, Hawaiian Telcom has used the factor proposed by the Wireline Competition Bureau for the 2017/2018 Tariff Period. The NANP factor of 0.0000368 for the 2016/2017 tariff period was proposed by the Wireline Competition Bureau on August 8, 2016 in Public Notice DA 16-899, *Proposed North American Numbering Plan Administration Fund Size Estimate and Contribution Factor and Fund Size for October 2016 through September 2017*, CC Docket No. 92-237.

### 1.3.4.1 CALCULATION OF NANP FUND CONTRIBUTIONS

Hawaiian Telcom calculated the NANPA exogenous amounts by calculating the difference between the NANPA contribution obligation in the current tariff rates and 2016 adjusted 499-A price cap total end user revenues multiplied by the proposed rate of 0.0000368 in DA 16-899. The Exogenous Cost Allocations Workpaper shows the amounts allocated to Common Line and Special Access services. The total Price Cap NANPA exogenous cost adjustment is ($270) in this filing, of which $(249) is allocated to Common Line and $(20) is allocated to Special Access.

## 1.4 DEMAND

### 1.4.1 INTRODUCTION

Hawaiian Telcom used current rates and 2016 base period demand quantities to determine the base period revenues. The base period demand was multiplied by rates at last PCI update to determine the weighted revenue for each rate element. This weighted revenue was used in the development of the PCIs, APIs, and SBIs.

### 1.4.2 DATA SOURCES

Hawaiian Telcom obtained the 2016 demand data from its customer billing system and CABS for each rate element for the Common Line and Special Access baskets, respectively. The 2016 base period demand has been used in this filing in accordance with the Commission's Rules for development of API and SBI indices.[6]

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[6] See 47 C.F.R. §§ 61.46 and 61.47.

### 1.4.3 DEMAND RESULTS

Base period demand detail used in the calculations of the PCIs, APIs, SBIs and the CMT is shown on HTHIA17a. Pursuant to paragraph 61.42(g) of the Commission's rules, only the demand for these services in geographic areas that have not obtained pricing flexibility relief, and for services that have not been removed from Price Caps in the qualifying MSAs, are included in the Price Cap baskets.

### 1.4.4 TREATMENT OF NEW SERVICES

As Figure 2 shows, no new price cap services were introduced during the 2016 base period. Further, no new price cap services have been introduced to date in 2017. Any new services in baskets or service categories that have been granted Phase I or Phase II pricing flexibility relief in an MSA, or MSAs, will be granted that same relief in the same MSAs. Hawaiian Telcom was granted pricing flexibility for special access services on Oahu in 2002[7]. The grant of pricing flexibility for special access services was extended to the non-MSA areas of Hawaii in 2008.[8]

### 1.5 RATEMAKING

Hawaiian Telcom has increased its multiline business and ISDN Primary Rate Interface (PRI) SLCs to $8.09 and $40.45, respectively. This represents a decrease in its common line basket revenues of $2,008,909 or -7.7393%, and complies with the CMT limits imposed on common line basket revenues.

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[7] *Petition of Verizon for Pricing Flexibility for Special Access and Dedicated Transport Services*, CCB/CPD File No. 01-27, MO&O, 17 FCC Rcd 5359 (2002).

## 1.6 WORKPAPERS AND TARIFF REVIEW PLAN

### 1.6.1 INTRODUCTION

Hawaiian Telcom has provided the necessary detail to support the calculation of the special access indices, common line CMT, and exogenous costs in its workpapers. The workpapers provided are shown in the Index in the next section.

### 1.6.2 INDEX

## Tariff Review Plan Long Form (HTHIAN17)

| | |
|---|---|
| **IND-1** | Price Cap Indices Display |
| **PCI-1** | Price Cap Index Calculations |
| **SUM-1** | Price Out Summary |
| **EXG-1** | Exogenous Cost Changes |
| **EXG-2** | Net Exogenous Cost Shifts |
| **RTE-1** | Rate Detail |
| **CAP-1** | Calculation of EUCL Limit, PICC and CCL Rates |
| **CAP-2** | Manual Input of EUCL rates |
| **CAP-3** | Calculation of Minimum and Maximum End User Rates |
| **CAP-4** | Allocation of Pool Revenues to MLB PICC and MLB EUCL |
| **CAP- 5** | Verification of Recovered CMT Revenue |
| **ANALYZER** | TRP Analyzer |

## Workpapers and Exhibits

| | |
|---|---|
| **OUTPC-1** | Services Excluded from Price Cap |
| **OUTPC-2** | Services Removed from Price Cap |

[8] *Petition of Hawaiian Telcom, Inc. for Phase I Pricing Flexibility Pursuant to Section 69.709 of the Commission's Rules*, WCB/Pricing File No. 08-01, Order, DA 08-1147 (2008).

| | |
|---|---|
| **Figure 1** | IND-1 References |
| **Figure 2** | New Services Introduced in 2016 |
| **Figure 3** | Form 492 A HTHI (Initial Year 2016 and Final 2015) |
| **Figure 4** | Single line Residence, Single Line Business, Non-Primary, Multi-line Business and PRI Proposed SLC Rates |
| **Figure 5** | PICC Rates |
| **Figure 6** | CCL Rates |
| **Figure 7** | CMT per line |
| **HTHIA17a** | Rate Detail File |
| **WP_Revenue Summary** | Revenue Summary |
| **Workpaper GDP-PI** | GDP-PI Factor Development |

**Exogenous Cost Allocations Workpaper**

## 2.0 INTRODUCTION

Hawaiian Telcom, Inc. ("Hawaiian Telcom") hereby submits its data in support of its Access Recovery Charge (ARC) transitional recovery mechanism as required by the Commission[9] and in compliance with Sections 51.700 through 51.715 and 51.901 through 51.919 of the Commission's Rules.[10]

## 2.1 DESCRIPTION AND JUSTIFICATION

The Commission's USF/ICC Transformation Order[11] adopted a transitional recovery mechanism intended to partially mitigate the effect of reduced switched access and reciprocal compensation revenue. The tariffed Access Recovery Charge (ARC) will be assessed upon end users that may be assessed an end user common line charge pursuant to Section 69.152.[12]

The ARC is developed based on the amount of required reductions in interstate and intrastate access and reciprocal compensation revenue (eligible revenue) divided by projected access line demand. The resulting ARC is subject to the rate distribution and ceiling requirements in Section 51.915(e).

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[9] In the Matter of Material to be Filed in Support of 2017 Annual Access Tariff Filings ("TRP Order"), DA 17-386, released April 24, 2017.

[10] See 47 C.F.R. §§ 51.700-715 and 51.901-919.

[11] Op Cit

[12] See 47 C.F.R. §§ 61.152 and 51.915(e).

## 2.2 DEMAND AND REVENUE DEVELOPMENT

### 2.2.1 DEMAND DEVELOPMENT

The Commission prescribed the base period of October 1, 2010 through September 30, 2011 as its Fiscal Year (FY) for switched access demand development. Hawaiian Telcom utilized its Carrier Access Billing System (CABS) to identify its billed switched access demand for the services provided during the FY base period. The demand was identified by direction and by jurisdiction, for each usage-based switched access rate element, and by jurisdiction for each fixed-charge switched access rate element.

For usage-based switched access rate elements, CABS utilizes calendar day billing cycles to group prior-month usage for current month billing. An adjustment would be required for the September usage that is included in the October billing cycles to identify the services provided prior to, or after, the defined FY 2011 base period.

Below is the description of the methodology used by Hawaiian Telcom to determine this billing cycle adjustment:

a. CABS reports were used to identify the calendar date that the usage-based switched access service was provided. This information was used to identify the September 2010 demand units included in the October 2010 billing cycles, which was removed from the FY demand results. This information was also used to identify the September 2011 demand units included in the October 2011 billing cycles, which was added to the FY demand results.

b. CABS reports are used to identify the carriers whose billing cycles require demand unit adjustments and the total usage-based switched access revenue billed for the specific month. This information is used to identify and separate the demand adjustments between terminating interstate end-office switched access, terminating interstate tandem-switched transport access, transitional intrastate access, Commercial Mobile Radio Systems (CMRS) reciprocal compensation and non-CMRS reciprocal compensation services.

c. The resulting demand unit adjustments were applied to develop the relevant base period revenue used in this filing, as included in the various FCC template worksheets described in section 3.

### 2.2.2 REVENUE DEVELOPMENT

Hawaiian Telcom developed the base period revenue as the sum of the following revenue components, for services provided during the FY base period, collected by March 31, 2012:

1. Terminating Interstate End Office Switched Access.
2. Terminating Interstate Tandem-Switched Transport Access Service.
3. Transitional Intrastate Access Service Revenue
4. Reciprocal Compensation Revenues, less reciprocal compensation payments made by March 31, 2012.

Below is the description of the methodology used by Hawaiian Telcom to determine the base period revenue:

a. Hawaiian Telcom multiplied the billed FY 2011 base period demand for terminating interstate end office switched access and interstate tandem switched transport access, by jurisdiction, by the applicable tariff or reciprocal compensation rates that were in effect as of December 31, 2011 to compute the FY 2011 base period revenue.

b. Hawaiian Telcom examined the open switched access disputes, as of March 31, 2012, to determine if additional adjustments would be required. This review included the open disputes that were paid, as of March 31, 2012, as well as the open disputes that were unpaid. From this information, Hawaiian Telcom determined that all of the open switched access disputes involved usage-based rate elements; there were no identified switched access fixed rate elements in dispute. Utilizing the Billed Account Numbers (BAN) and the invoice numbers, Hawaiian Telcom identified the actual billing period which is in dispute. From this information, open disputes from the Commission's prescribed FY base period was identified. This information was also used to identify and separate the open dispute revenue adjustments between terminating interstate end-office switched access, terminating interstate tandem-switched transport access, transitional intrastate access, Commercial Mobile Radio Systems (CMRS) reciprocal compensation and non-CMRS reciprocal compensation services.

c. CABS accounts with an outstanding balance over 90 days old, as of March 31, 2012, were identified. Utilizing BAN and invoice numbers, Hawaiian Telcom identified the actual billing period in which the 90 day old unpaid balance was incurred. From this information, unpaid balances from the Commission's prescribed FY base period were identified. This information was also used to validate that there were no unpaid balances associated with switched access services provided during the FY 2011 base period.

d. Late payment charges, adjustments to late payment charges, special access revenue, billing adjustments and write-offs were excluded from the revenue base used in this filing.

### 2.2.3 LINE COUNT DEVELOPMENT

Hawaiian Telcom developed a 12-month annual line count forecast by analyzing the Access line count change from total year 2013 to total year 2014, total year 2014 to total year 2015, and total year 2015 to total year 2016, by line type, and by central office. Hawaiian Telcom developed a straight-line forecast change rate, by line type, and by central office. A similar analysis was completed for residential lifeline access lines, by central office. Hawaiian Telcom used the December 2016 annualized line counts, by line type, by central office as the beginning point for developing the line forecast used in this filing. The straight-line change rate was applied to the December 2016 annualized line counts to develop the access line demand counts for the July 2017 through June 2018 period. The resulting forecast lines were reduced by the forecast residential lifeline access lines, by central office.

## 2.3 COMPLIANCE WITH ARC REQUIREMENTS

The Commission requires Hawaiian Telcom to compute the revenue impacts of the access rate and reciprocal compensation reductions to determine the amount of recoverable eligible revenue. The Eligible Revenue is distributed between residential, single line business and multi-line business demand to derive the respective ARC rates. The resulting ARC rates are validated to ensure compliance to the implementation and ceiling requirements defined in Section 51.915(b)-(e) of the Commission's rules.

### 2.3.1 ACCESS REDUCTION FORM (HTHIAR17)

The Access Reduction spreadsheet shows the calculation of the eligible revenue recovery associated with the required reduction of intrastate access rates, and starting in the 2014/2015 tariff period, interstate access rates. The FCC spreadsheet template provides the methodology to develop the eligible recovery amount from rates that are required to be reduced. Hawaiian Telcom used the resulting FY 2011 base period demand and FY 2011 base period revenue, as developed in section 2.2, above, to develop this spreadsheet. This worksheet demonstrates the calculations necessary to comply with section 51.915(b)-(e) of the Commission's rules.

For the 2017/2018 tariff period, both interstate and intrastate terminating traffic sensitive rates have completed the transition to bill and keep and are set at zero. In addition, the first step in the transition of terminating tandem switched access charges to bill and keep must be implemented in the 2017/2018 tariff period, requiring that composite tandem switching rates not exceed $0.0007. Because only tandem switched traffic between an ILEC's tandem and end offices the same ILEC owns are subject to the transition to bill and keep, HT has divided its base period 2011 tandem switched MOUs between traffic where the tandem switch and end office are both owned by HT and third party traffic where the terminating end office is not owned by HT or any of its affiliates. To effect this division, HT has analyzed billing data from the March 2015 to March 2017 time period and developed allocation factors which it has applied to the 2011 base period tandem switched demand. Consistent with standard industry practice.

The eligible revenue contribution associated with intrastate and interstate access rate reductions is $3,361,258 for the 2017/2018 tariff period.

### 2.3.2 2014 TRUE UP FORM (HTHITU17)

The 2015 True Up spreadsheet shows the calculations necessary to derive the FY 2015 True-Up Revenues for inclusion in the 2017/2018 ARC development. The Actual Realized demand was developed by identifying the billed FY 2015 demand, by month, by line type, by central office, less Lifeline demand, and less any corresponding demand for which payment had not been received, as of May 25, 2017. The FCC spreadsheet template provides the methodology for calculating the True-Up revenue to comply with section 51.915(d)(1)(iv)(F) of the Commission's rules.

The Eligible 2014/2015 True-Up Revenue that can be recovered through the ARC is $32,755.

### 2.3.3 RECIPROCAL COMPENSATION FORM (HTHIRC17)

The Reciprocal Compensation spreadsheet shows the calculation of the eligible revenue due to Reductions in the CMRS providers' and non-CMRS providers' reciprocal compensation contract rates. The FCC spreadsheet template provides the methodology for calculating the eligible net CMRS and net non-CMRS Reciprocal Compensation revenue.

For CMRS eligible revenue development, a composite reciprocal compensation rate is developed by using the FY 2011 base period demand units and FY 2011 base period revenue, as developed in section 2.2, above. The resulting CMRS revenue, less FY 2011 expenses (payments) paid by Hawaiian Telcom, as of March 31, 2012, is the net CMRS reciprocal compensation eligible revenue contribution to the ARC rate development. Because reciprocal compensation with CMRS carriers will be eliminated and traffic will be exchanged under bill and keep arrangements, this amount is the same as that used in previous tariff periods. This worksheet demonstrates the calculations necessary to comply with sections 51.705 and 51.915(b)-(e) of the Commission's rules.

The eligible revenue contribution associated with the net CMRS Reciprocal Compensation conversion to Bill-and-Keep is $194,940.

Pursuant to section 51.915(d)(1)(iv)(E)(3) of the Commission Rules[13], Hawaiian Telcom has elected to forgo any recovery of net non-CMRS reciprocal compensation reductions.

### 2.3.4 ELIGIBLE REVENUE FORM (HTHIER17)

The Eligible Revenue spreadsheet shows the calculations necessary to derive the eligible revenue recoverable through the tariffed ARC rates. The FCC spreadsheet template provides the methodology for calculating the eligible revenue. This worksheet shows the eligible Access Reduction, net non-CMRS Reciprocal Compensation, and net-CMRS Reciprocal Compensation revenue. A Traffic Demand Factor of 53.14% (equal to 90% of last year's 59.05% factor)[14] and 90% CALLS Study Area Base Factor[15] are applied to the above revenues, and the True-Up revenues are added to derive the recoverable eligible revenue. This spreadsheet demonstrates the calculations necessary to determine eligible revenue to comply with section 51.915(e) of the commission's rules.

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[13] See 47 C.F.R. §§ 51.915(d)(1)(iv)(E)(3).
[14] See 47 C.F.R. §§ 51.915(b)(10).
[15] See 47 C.F.R. §§ 51.915(b)(2).

The Eligible Revenue that can be recovered through the ARC is $ 1,733,674 for the 2017/2018 tariff period.

### 2.3.5 RATE CEILING VALIDATION FORM (HTHIARC17)

The Rate Ceiling Validation spreadsheet demonstrates the calculations necessary to validate that Hawaiian Telcom's ARC rates comply with the ceiling restrictions in Section 51.915 of the Commission's Rules.[16] The FCC template spreadsheet provides the methodology for validating compliance.

### 2.3.6 TARIFF RATE COMPARISON FORM (HTHITRC17)

The Tariff Rate Comparison spreadsheet demonstrates the calculations necessary to validate that Hawaiian Telcom's proposed ARC rates comply with implementation and revenue recovery restrictions in section 51.915 of the Commission's rules. The FCC template spreadsheet provides the methodology for validating compliance.

### 2.3.7 SUMMARY ELIGIBLE RECOVERY FORM (HTHISUMER17)

The Summary Eligible Recovery Form compares the components of eligible recovery in this tariff filing for the 2017/2018 tariff period with those in the filing for the 2016/2017 tariff period.

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[16] See 47 C.F.R. §§ 51.915(b)(11) and (12) and §§ 51.915(e).

## 2.4 RATEMAKING

Hawaiian Telcom has established an ARC rate of $0.47 for Primary Residential, Single-Line Business, ISDN Basic Rate Interface (BRI) and non-Primary Residential End Users. Hawaiian Telcom has established an ARC of $0.95 and $4.75, for multiline business and ISDN Primary Rate Interface (PRI) End Users, respectively.

Hawaiian Telcom does not qualify for additional support from the Connect America Fund (CAF).

## 2.5 ACCESS RECOVERY CHARGE WORKPAPERS

### 2.5.1 INTRODUCTION

Hawaiian Telcom is providing the necessary detail to support the calculation of the ARC in its work papers. The work papers provided are shown in the Index in the next section.

### 2.5.2 INDEX

| | |
|---|---|
| **HTHIAR17 (Proprietary)** | Access Reduction Form (Proprietary) |
| **HTHIAR17 (Public)** | Access Reduction Form (Public) |
| **HTHIRC17** | Reciprocal Compensation Form |
| **HTHIER17** | Eligible Recovery Form |
| **HTHIARC17 (Proprietary)** | Rate Ceiling Validation Form (Proprietary) |
| **HTHIARC17 (Public)** | Rate Ceiling Validation Form (Public) |
| **HTHITRC17 (Proprietary)** | Tariff Rate Comparison Form (Proprietary) |
| **HTHITRC17 (Public)** | Tariff Rate Comparison Form (Public) |

| | |
|---|---|
| **HTHISUMER17 (Proprietary)** | Summary Eligible Recovery Form (Proprietary) |
| **HTHISUMER17 (Public)** | Summary Eligible Recovery Form (Public) |
| **HTHITU17 (Proprietary)** | Access Recovery True-Up Form (Proprietary) |
| **HTHITU17 (Public)** | Access Recovery True-Up Form (Public) |