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July 17, 2017

Transmittal No. 1519 - 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 Associations, 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. 1519 to submit updated Tariff Review Plan (TRP) Connect America Fund Inter-carrier Compensation (CAF ICC) and Connect America Fund Broadband Loop Support (CAF BLS) spreadsheet files, as described below.

Transmittal No. 1519 was originally filed on June 16, 2017 and became effective on July 1, 2017. As part of the cost support for Transmittal No. 1519, NECA submitted the required TRP CAF ICC and TRP CAF BLS spreadsheet files for the 2017-2018 tariff test period.

In response to the Commission's recent *Order*¹ granting a limited waiver of 47 CFR 51.917(b) to reflect the inclusion of intrastate terminating switched access revenues the company was unable to recover by the March 31, 2012 cutoff date, this amendment reflects adjustments to the base period revenue amounts shown in the TRPCAFICC_Confidential.xlsx file for West Kentucky Rural Telephone Cooperative Corporation, Inc. (SAC 260421) for the periods from October 6, 2016 through June 30, 2017 and July 1, 2017 through June 30, 2018.

¹ See In the Matter of Connect America Fund, Developing a Unified Inter-carrier Compensation Regime, Petitions for Waiver of Section 51.917 of the Commission's Rules, WC Docket No. 10-90 and CC Docket No. 01-92, FCC 17-83 (rel. June 27, 2017) (*Order*).

This amendment also includes updates to the TRPCAFICC_Confidential.xlsx files to reflect revised Access Recovery Charge (ARC) revenues for the following companies:

Table 1

<u>Company Name</u>	<u>State</u>	<u>Study Area</u>
Arapahoe Telephone Company	NE	371516
Partner Communications Cooperative	IA	351187
Triangle Telephone Cooperative Association, Inc.	MT	482257
Triangle Telephone Cooperative Association, Inc.	MT	483310

In addition, this amendment includes updates to the TRPCAFBLS_Confidential.xlsx file to reflect updated Consumer Only Broadband Loop (CBOL) demand and revenue data for the following companies:

Table 2

<u>Company Name</u>	<u>State</u>	<u>Study Area</u>
ETS Telephone Company	TX	442091
New Knoxville Telephone Cooperative	OH	300639

Coincident with this amendment, NECA is filing tariff revisions today under Transmittal No. 1521 to revise certain Residential and Multiline Business ARC rates for the companies listed in Table 1 and to revise CBOL rates for the companies listed in Table 2.

This amendment includes an update to the TRPCAFBLS_Confidential.xlsx file for North Dakota Telephone Co. (SAC 381447) to reflect a corrected calculated maximum CBOL charge for the purposes of reporting CAF BLS data to USAC and for pool settlement distribution and support true-up calculations.

This filing also amends Transmittal No. 1519 to submit the files containing updated certifications for the above listed companies in Appendix C, Exhibit 1 Carriers not Seeking Duplicative Recovery; Exhibit 2 Carrier Eligibility for CAF/ICC Recovery; Exhibit 3 Accuracy of CAF ICC Data, Exhibit 4 Accuracy of CAF BLS Data and Exhibit 5 Base Period Adjustment (BPR). No changes were made to other companies' certifications previously submitted in the Appendix C Exhibits.

Finally, this amendment resubmits the TRP Text.pdf and TRP_Exhibits.xls files originally filed on June 16, 2017. No changes were made to the originally transmitted files other than to reflect today's resubmission.

As was the case with the confidential TRP CAF ICC and TRP CAF BLS data files originally transmitted on June 16, 2017 under Transmittal No. 1519, NECA seeks confidential treatment of this data pursuant to the *Protective Order* designated for use in the 2017 Annual Access Charge Tariff Filings proceeding.²

² See Announcing Procedures for Obtaining Confidential Information for 2017 Annual Access Charge Tariff Filings and Corrections to TRP Spreadsheets, Public Notice Attachment, WC Docket No. 17-65, DA 17-550 (rel. June 6, 2017) (*Protective Order*).

Accordingly, the confidential data files have been marked, **“CONTAINS PRIVILEGED AND CONFIDENTIAL INFORMATION – DO NOT RELEASE (PER DA 17-550 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.”**

Attachment B to this transmittal includes the listing of FCC Registration Numbers (FRNs) for the Telephone Companies on whose behalf this tariff 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	
TRP Text.pdf	
TRP_Exhibits.xls	
TRPCAFICC_ConfidentialA.xlsx	TRPCAFICC_PublicA.xlsx
TRPCAFICC_ConfidentialB.xlsx	TRPCAFICC_PublicB.xlsx
TRPCAFICC_ConfidentialC.xlsx	TRPCAFICC_PublicC.xlsx
TRPCAFICC_ConfidentialD.xlsx	TRPCAFICC_PublicD.xlsx
TRPCAFICC_ConfidentialE.xlsx	TRPCAFICC_PublicE.xlsx
TRPCAFBLS_Confidential.xlsx	TRPCAFBLS_Public.xlsx
Vol1ExhibitsA.pdf	Vol1ExhibitsB.pdf
Vol1ExhibitsC.pdf	Vol1ExhibitsD.pdf
Vol1ExhibitsE.pdf	Vol1ExhibitsF.pdf
Vol1ExhibitsG.pdf	Vol1ExhibitsH.pdf

Request for Confidential Treatment

NECA seeks confidential treatment under the *Protective Order* designated for use in the 2017 Annual Access Charge Tariff Filings proceeding¹ for the data provided in the files 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 Annual Tariff filing, made under Transmittal No. 1519. 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 an electronic copy 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 is 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) pool participants:

TRPCAFICC_ConfidentialA.xlsx
TRPCAFICC_ConfidentialB.xlsx
TRPCAFICC_ConfidentialC.xlsx
TRPCAFICC_ConfidentialD.xlsx
TRPCAFICC_ConfidentialE.xlsx
TRPCAFBLS_Confidential.xlsx

¹ See Announcing Procedures for Obtaining Confidential Information for 2017 Annual Access Charge Tariff Filings and Corrections to TRP Spreadsheets, Public Notice Attachment, WC Docket No. 17-65, DA 17-550 (rel. June 6, 2017) (*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*, ¶ 1.a.

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

This information includes actual revenues, revenue requirement data and demand for the 2011 fiscal year; trued-up revenues and cost data for the 2015/2016 test period; projections of revenues, cost data and demand for the 2012/2013, 2013/2014, 2014/2015, 2015/2016, 2016/2017, and 2017/2018 test periods; and the product of calculations made using the confidential data.

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.

The 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 2017/2018 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 Annual Access Charge Filing, Transmittal No. 1519 in WC Docket No. 17-65.

- 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 pool participants as required by Commission rules for monitoring compliance with the CAF ICC and CAF BLS recovery mechanisms. At the study area and exchange level, the information is granular and highly confidential to the reporting CL and TS pool participants. The financial data is treated as a confidential trade secret by CL and TS pool 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 pool 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/or TS pool. 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 files as follows:

**CONTAINS PRIVILEGED AND CONFIDENTIAL INFORMATION – DO NOT
RELEASE (PER DA 17-550 PROTECTIVE ORDER)**

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

⁷ See *Protective Order*, ¶ 16.

FCC Registration Number for Tariff 5 Participants

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0002432672	0007196207	0004334934	0003732633
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0003757374	0001570936	0001772888	0003732302
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0004156139	0003766714	0003745825	0002771228
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0001565829	0004339800	0004339784	0001700947
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0004312203	0003738093	0002718799	0003779675
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0002713683	0004365318	0001887728	0003707775
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0004381422	0003749264	0004329538	0002607224
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FCC Registration Number for Tariff 5 Participants

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0001593938	0002592517	0005069372	0002387868
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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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0003730959	0004275137	0003775244	0003723681
0004330007	0003738309	0004362505	0003741964
0004328472	0001643006	0001559798	0001607829
0003727575	0003757838	0001623149	0003759859
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0003749587	0001601996	0006662423	0003740446
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
0001583194	0001644798	0003785300	0004969093
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0002643799	0003774460	0001857598	0003718426
0004939864	0002334555	0003722907	0005067665
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0003756590	0003744141	0003772993	0004073680
0002590032	0025531955	0003724655	0001678804
0004341285	0001581974	0001731280	0004985065
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