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October 17, 2018

Transmittal No. 1549 - 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. 1549 to submit an updated Tariff Review Plan (TRP) Connect America Fund Broadband Loop Support (CAF BLS) spreadsheet file, as described below.

Transmittal No. 1549 was originally filed on June 18, 2018, became effective on July 3, 2018 and was amended on July 17, 2018, August 17, 2018 and September 17, 2018. As part of the cost support for Transmittal No. 1549, NECA submitted the required TRP CAF ICC and TRP CAF BLS spreadsheet files for the 2018-2019 tariff test period.

This amendment updates the TRPCAFBLS\_Confidential.xlsx file to reflect updated Consumer Broadband-Only Loop (CBOL) demand, revenue and/or tariffed rate data for the companies listed in Table 1, following.

**Table 1**

<b><u>Company Name</u></b>	<b><u>State</u></b>	<b><u>Study Area</u></b>
Consolidated Telcom	ND	381607
Dakota Central Telecom I, Inc.	ND	381610
Dakota Central Telecommunications Cooperative	ND	381610
Direct Communications Rockland, Inc.	ID	472232
Egyptian Telephone Cooperative Association	IL	341003
Farmers Telephone Company	IA	351175
Granite State Telephone Company	NH	120039
Gridley Telephone Company	IL	341023
Iamo Telephone Company	IA	351206
Iamo Telephone Company	MO	421206
Interstate Telecommunications Cooperative, Inc.	SD	391654
Interstate Telecommunications Cooperative, Inc.	SD	391679
Lemonweir Valley Telephone Company	WI	330900
Madison Telephone Company	IL	341049
North Dakota Telephone Co.	ND	381447
Pine Tel. Co.	OK	432017
Sandhill Telephone Cooperative, Inc.	SC	240546
Scott County Telephone Cooperative, Inc.	VA	190248
Totah Communications, Inc.	OK	432030
Turtle Mountain Communications, Inc.	ND	381636
United Telephone Mutual Aid Corp.	ND	381636
Valley Telecomm Coop. Assn., Inc.	SD	391685
Venture Communications Cooperative	SD	391680
Venture Communications Cooperative	SD	391688
Wabash Telephone Cooperative, Inc.		
d/b/a Wabash Communications Co-op.	IL	341088
Waitsfield-Fayston Telephone Co., Inc.	VT	140069

Coincident with this amendment, NECA is filing tariff revisions today under Transmittal No. 1558 to introduce new or revise existing CBOL rates for the companies listed in Table 1 with the exception of Pine Tel. Co. who has a change in demand but no change in its currently tariffed CBOL rate.

This filing also amends Transmittal No. 1549 to submit the file containing updated certifications as appropriate for the above companies in Appendix C, Exhibit 4 Accuracy of CAF BLS Data. No changes were made to other companies' certifications previously submitted in the Appendix C Exhibits.

Finally, this amendment resubmits the TRP Text.pdf, TRP\_Exhibits.xls files and other TRP CAF ICC.xlsx files originally filed on June 18, 2018 as amended on July 17, 2018, August 17, 2018 and September 17, 2018. 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 files originally transmitted on June 18, 2018 under Transmittal No. 1549, NECA seeks confidential treatment of this data pursuant to the *Protective Order* designated for use in the 2018 Annual Access Charge Tariff Filings proceeding.<sup>1</sup>

Accordingly, the confidential files have been marked, “**CONTAINS PRIVILEGED AND CONFIDENTIAL INFORMATION – DO NOT RELEASE (PER DA 18-578 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	TRP Text.pdf
Attachment B	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
VollExhibitsD.pdf	

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<sup>1</sup> See Announcing Procedures for Obtaining Confidential Information for 2018 Annual Access Charge Tariff Filings and Corrections to TRP Spreadsheets, Public Notice Attachment, WC Docket No. 18-100, DA 18-578 (rel. June 4, 2018) (*Protective Order*).

## Request for Confidential Treatment

NECA seeks confidential treatment under the *Protective Order* designated for use in the 2018 Annual Access Charge Tariff Filings proceeding<sup>1</sup> for the data provided in the TRP 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. 1549. 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 an electronic copy of the un-redacted TRP 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 TRP 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.<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 TRP files.

- Identification of the specific information for which confidential treatment is sought:  
  
NECA seeks confidential treatment for certain information in the following TRP 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

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<sup>1</sup> See Announcing Procedures for Obtaining Confidential Information for 2018 Annual Access Charge Tariff Filings and Corrections to TRP Spreadsheets, Public Notice Attachment, WC Docket No. 18-100, DA 18-578 (rel. June 4, 2018) (*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*, ¶ 1.a.

<sup>6</sup> 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 2016/2017 test period; projections of revenues, cost data and demand for the 2012/2013, 2013/2014, 2014/2015, 2015/2016, 2016/2017, 2017/2018 and 2018/2019 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 2018/2019 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. 1549 in WC Docket No. 18-100.

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

The information in the TRP 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 TRP 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 TRP 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.<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/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 TRP 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 TRP files as follows:

**CONTAINS PRIVILEGED AND CONFIDENTIAL INFORMATION – DO NOT  
RELEASE (PER DA 18-578 PROTECTIVE ORDER)**

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

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<sup>7</sup> See *Protective Order*, ¶ 16.

## FCC Registration Number for Tariff 5 Participants

0001646454	0003741949	0002645927	0002645927
0002756187	0002756187	0002756187	0002756187
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0004924809	0004924809	0015034358	0002432672
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0002587491	0004329314	0003757374	0001570936
0001772888	0003732302	0003778594	0003746542
0004311528	0004379715	0004379723	0004379731
0004379749	0004379707	0004329330	0004056248
0001951144	0004365276	0004328654	0003722949
0004320297	0002589281	0002723534	0004933032
0004156139	0003766714	0003745825	0002771228
0004319737	0003723640	0003749736	0004335816
0001565829	0004339800	0004339784	0001700947
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0003795697	0003749819	0004317368	0002588606
0004268918	0001700905	0003722121	0004330874
0004335782	0003779675	0002549392	0004331682
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0001855337	0004381422	0003749264	0004329538
0002607224	0004979688	0002405215	0004329611
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0004970711	0004329710	0002598209	0004381711
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0004953980	0002147098	0001615095	0004332102

## FCC Registration Number for Tariff 5 Participants

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0005069372	0002387868	0003723467	0003730850
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0003451317	0004380952	0003722188	0004321733
0002332930	0001623321	0004318895	0003759917
0003745791	0003745957	0001856400	0004328704
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0001714245	0004334439	0001664481	0001664481
0003716503	0003741253	0002393379	0011862927
0004321790	0003739885	0005093372	0004329223
0001629781	0001546746	0002595452	0004384111
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0004326849	0002817823	0003723525	0003757580
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0001858760	0003741956	0003742038	0004327417
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0003726759	0014710388	0003748043	0003755642
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0003781556	0003722824	0004338489	0003741576
0003741576	0002596195	0002550309	0003801925
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0003748183	0003749140	0003739380	0001546068
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0004320164	0001791995	0004322269	0003720968
0004273751	0003734696	0004068474	0004986410
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0004329348	0004321444	0005081567	0002595734



## FCC Registration Number for Tariff 5 Participants

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0003708203	0003727054	0004973202	0003762465
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0004324661	0003748167	0002801256	0002652048
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0001583350	0001583350	0004975769	0003740610
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0004966149	0003731734	0004340410	0003709888
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0003741535	0003739976	0001551837	0004325148
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0001889245	0003737376	0004283917	0005139662
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0004335873	0021672852	0002818177	0002639870
0005066063	0003454410	0003755832	0002430536
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0001756089	0003722840	0005049895	0002592061
0005063458	0003774056	0008326787	0004337648
0002588051	0004928750	0004928750	0004273454
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0003726890	0002816411	0002339976	0001753938
0001792787	0001730944	0004937827	0004285474
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0003774072	0001646470	0001646470	0004374047
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## FCC Registration Number for Tariff 5 Participants

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0003708120	0003767449	0004324620	0004929717
0004312187	0004311809	0005020169	0003767472
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0001699578	0003748449	0004337218	0003795754
0002590586	0004315362	0004334611	0002594067
0003767340	0003733847	0003738986	0003738986
0002801256	0002946879	0002922201	0004334512
0005097134	0005097167	0004269817	0003748506
0003222213	0001886860	0003748514	0001700418
0003723756	0002650422	0007183619	0005062955
0004313953	0002644953	0003717709	0004930277
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0003732484	0005067186	0002071116	0004925129
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0001855287	0003727146	0001596667	0003730959
0003730959	0004275137	0003723681	0004330007
0003738309	0004362505	0003741964	0004328472
0001643006	0001559798	0001607829	0003727575
0003757838	0001623149	0003759859	0003759859
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0004310769	0003767613	0002593481	0004329629
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0004278420	0004278420	0003758877	0002593440
0004334017	0020707907	0002069862	0002648285
0002598076	0003749512	0004269809	0003767712

## FCC Registration Number for Tariff 5 Participants

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0001630532	0004975199	0001521241	0004335808
0011396082	0001952555	0004980421	0003746013
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0004924866	0001607175	0004327011	0004280665
0002587863	0002588333	0006764948	0002898724
0002333888	0001648039	0001731785	0004309522
0001687557	0003745130	0003774338	0004981114
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0002590073	0001667765	0003740008	0001583194
0001644798	0003785300	0004969093	0003767969
0002333672	0004321451	0001616192	0002643799
0003774460	0001857598	0003718426	0004939864
0002334555	0003722907	0005067665	0002590057

## FCC Registration Number for Tariff 5 Participants

0002590057	0003774478	0003774494	0003756590
0003756590	0003744141	0003772993	0004073680
0002590032	0025531955	0003724655	0001678804
0004341285	0001581974	0001731280	0004985065
0004983896	0004948253	0004328134	