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December 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 Intercarrier Compensation (CAF ICC) and Connect America Fund Broadband Loop Support (CAF BLS) spreadsheet files, 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, September 17, 2018, October 17, 2018 and November 16, 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 modifies the TRPCAFICC_Confidential.xlsx files to update the footnote listing those study areas which have requested NECA to tariff lower Access Recovery Charge (ARC) rates than those calculated by NECA to include Peoples Telephone Cooperative (SAC/ST 422130/TX) and Radcliffe Telephone Company, Inc. (SAC/ST 351277/IA).

Coincident with this amendment, NECA is filing tariff revisions today under Transmittal No. 1563 to reduce the Residential ARC rate for Peoples Telephone Cooperative and Radcliffe Telephone Company, Inc.

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 following companies:

Table 1

<u>Company Name</u>	<u>State</u>	<u>Study Area</u>
Ardmore Tel. Co., Inc	TN	290280
Baldwin Nashville Telephone Company, Inc.	IA	351107
Bledsoe Tel. Coop.	TN	290554
Bloomer Telephone Company	WI	330850
Brantley Telephone Company, Inc.	GA	220347
Cascade Communications Company	IA	351118
Citizens Mutual Telephone Cooperative	IA	351129
Consolidated Telephone Company	MN	361373
Ellsworth Coop. Telephone Association	IA	351157
Farmers Mutual Telephone Company	MN	361389
Federated Telephone Cooperative	MN	361390
Federated Telephone Cooperative	MN	361403
Garden Valley Telephone Company		
d/b/a Garden Valley Technologies	MN	361395
Gardenville Cooperative Telephone Association	MN	361396
Guadalupe Valley Tel. Co-op, Inc.	TX	442083
Halstad Telephone Company	MN	361401
Kasson & Mantorville Telephone Company	MN	361412
Lismore Cooperative Telephone Company	MN	361419
Lonsdale Telephone Company	MN	361422
Lost Nation-Elwood Telephone Company	IA	351229
Minburn Telecommunications, Inc.	IA	351158
Minburn Telephone Company	IA	351245
Missouri Valley Communications, Inc.	ND	382247
Nemont Telephone Cooperative, Inc.	ND	382247
Nemont Telephone Cooperative, Inc.	MT	482247
Polar Communications Mutual Aid Corporation	ND	381614
Polar Communications Mutual Aid Corporation	ND	381630
RC Technologies	SD	391674
Runestone Telephone Association		
d/b/a Runestone Telecom Association	MN	361423
Runestone Telephone Association		
d/b/a Runestone Telecom Association	MN	361475
Spring Valley Telephone Company, Inc.	WI	330953
Tri-County Communications Cooperative, Inc.	WI	330960
Twin Lakes Telephone Cooperative Corp.	TN	290579
United Farmers Telephone Company	IA	351316
West Kentucky Rural Telephone Cooperative Corporation, Inc.	KY	260421
West Kentucky Rural Telephone Cooperative Corporation, Inc.	TN	290598
Wilkes Telephone & Electric Company, Inc.	GA	220394
Wolverton Telephone Company	MN	361512
Wolverton Telephone Company	ND	381509

Coincident with this amendment, NECA is filing tariff revisions today under Transmittal No. 1563 to introduce new or revise existing CBOL rates for the companies listed in Table 1.

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 and TRP_Exhibits.xls files originally filed on June 18, 2018 as amended on July 17, 2018, August 17, 2018, September 17, 2018, October 17, 2018 and November 16, 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.¹

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.

¹ 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*).

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

TRPCAFICC_ConfidentialD.xlsx

TRPCAFICC_ConfidentialE.xlsx

TRPCAFBLS_Confidential.xlsx

Vol1ExhibitsD.pdf

TRP Text.pdf

TRP_Exhibits.xls

TRPCAFICC_PublicA.xlsx

TRPCAFICC_PublicB.xlsx

TRPCAFICC_PublicC.xlsx

TRPCAFICC_PublicD.xlsx

TRPCAFICC_PublicE.xlsx

TRPCAFBLS_Public.xlsx

Request for Confidential Treatment

NECA seeks confidential treatment under the *Protective Order* designated for use in the 2018 Annual Access Charge Tariff Filings proceeding¹ 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 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 TRP 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 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.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 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

¹ 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*).

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 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.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 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**.

⁷ See *Protective Order*, ¶ 16.

FCC Registration Number for Tariff 5 Participants

0001646454	0003741949	0002645927	0002645927
0002756187	0002756187	0002756187	0002756187
0012207346	0004339453	0004311627	0001584960
0003742897	0003714805	0004273850	0003764735
0004924809	0004924809	0015034358	0002432672
0003745940	0003745940	0003745940	0002432672
0007196207	0004334934	0003732633	0022150361
0022150361	0001726488	0002723773	0002723732
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
0002477636	0004380986	0001773464	0002387264
0003774965	0002645497	0005053251	0004935730
0003773454	0004491544	0003773504	0004980843
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0003766201	0005068341	0004560645	0002723336
0004330205	0004342895	0004381323	0002331262
0003723491	0005058151	0001677335	0003730835
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0001715937	0004341855	0001698752	0004340949
0004381174	0001676519	0004473682	0001700186
0005067228	0004330908	0003716255	0004330965
0003795697	0003749819	0004317368	0002588606
0004268918	0001700905	0003722121	0004330874
0004335782	0003779675	0002549392	0004331682
0005050083	0002713683	0004365318	0001887728
0003707775	0002426831	0003777885	0003732609
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0003733029	0004374187	0002504298	0001961416
0001855337	0004381422	0003749264	0004329538
0002607224	0004979688	0002405215	0004329611
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0004970711	0004329710	0002598209	0004381711
0004318556	0025531922	0004382602	0002592285
0003773579	0001678044	0003731759	0004333035
0004953980	0002147098	0001615095	0004332102

FCC Registration Number for Tariff 5 Participants

0002594125	0004321618	0004973301	0001888718
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0003756764	0002593358	0003773629	0002588192
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0005069372	0002387868	0003723467	0003730850
0002334225	0002334225	0003723707	0004319117
0003451317	0004380952	0003722188	0004321733
0002332930	0001623321	0004318895	0003759917
0003745791	0003745957	0001856400	0004328704
0025531930	0004964227	0002771244	0005872015
0001714245	0004334439	0001664481	0001664481
0003716503	0003741253	0002393379	0011862927
0004321790	0003739885	0005093372	0004329223
0001629781	0001546746	0002595452	0004384111
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0001858760	0003741956	0003742038	0004327417
0001607340	0003788940	0004314605	0004322814
0003726759	0014710388	0003748043	0003755642
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0004776464	0004776464	0004255303	0003747722
0003739075	0002596377	0002596344	0003722790
0005093224	0001887025	0001754738	0003722113
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0003741576	0002596195	0002550309	0003801925
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0003748183	0003749140	0003739380	0001546068
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0004356952	0001742170	0004320909	0002652519
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0004273751	0003734696	0004068474	0004986410
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0003710100	0002388262	0002333839	0002430684
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0003742475	0003734803	0001856566	0004334918
0004329348	0004321444	0005081567	0002595734

FCC Registration Number for Tariff 5 Participants

0001616200	0004970067	0002587954	0005063078
0004262853	0003715877	0003721008	0003743358
0002776599	0003194776	0001773225	0001685841
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0003708203	0003727054	0004973202	0003762465
0002392249	0014295679	0001886944	0002587707
0004324661	0003748167	0002801256	0002652048
0004333050	0003722477	0003722477	0003744596
0001583350	0001583350	0004975769	0003740610
0003739521	0003741550	0003741550	0003741550
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0004314100	0004329884	0005061387	0004381281
0002591154	0004362364	0004362364	0001714146
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0003772274	0004980611	0001616937	0004193983
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0001889245	0003737376	0004283917	0005139662
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0003773975	0003773975	0001730969	0003741733
0004322079	0004287538	0025093154	0002719474
0004327961	0004939724	0003433323	0004367678
0002594752	0003774023	0004301370	0003724630
0005061544	0004331062	0004324828	0002504058
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0005066063	0003454410	0003755832	0002430536
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0001756089	0003722840	0005049895	0002592061
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0002588051	0004928750	0004928750	0004273454
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0003726890	0002816411	0002339976	0001753938
0001792787	0001730944	0004937827	0004285474
0003739554	0004380945	0005069935	0002594190
0003748258	0003723665	0003737194	0009965104
0003774072	0001646470	0001646470	0004374047
0005082060	0002071579	0004328688	0004382610

FCC Registration Number for Tariff 5 Participants

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0003745734	0005069125	0003757432	0002594893
0001714567	0004337044	0002388882	0004322178
0001731850	0002595858	0003774262	0004331724
0003738994	0002477693	0002576452	0003722998
0003708120	0003767449	0004324620	0004929717
0004312187	0004311809	0005020169	0003767472
0002819191	0005067509	0002594778	0001699412
0001699578	0003748449	0004337218	0003795754
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0003767340	0003733847	0003738986	0003738986
0002801256	0002946879	0002922201	0004334512
0005097134	0005097167	0004269817	0003748506
0003222213	0001886860	0003748514	0001700418
0003723756	0002650422	0007183619	0005062955
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0004337374	0003715885	0002061653	0001618081
0003732484	0005067186	0002071116	0004925129
0004310694	0002593986	0001566629	0003723715
0001678788	0003739208	0004314316	0001887140
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0001699776	0004315461	0001856673	0001913979
0001537133	0002334795	0001584275	0001565316
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0004306825	0004384517	0002477610	0002477610
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0001623818	0003758315	0001856236	0002898856
0003193000	0002592509	0004928255	0002333649
0001951284	0001646140	0001646140	0003728680
0002593655	0011574746	0003742384	0004318507
0002477743	0001714708	0003762796	0005076922
0003774296	0005059092	0003745700	0003707791
0001855287	0003727146	0001596667	0003730959
0003730959	0004275137	0003723681	0004330007
0003738309	0004362505	0003741964	0004328472
0001643006	0001559798	0001607829	0003727575
0003757838	0001623149	0003759859	0003759859
0001551423	0001551423	0001615665	0002329662
0004310769	0003767613	0002593481	0004329629
0014860530	0005025267	0003709458	0003767662
0004266664	0005061627	0001886464	0004986477
0004278420	0004278420	0003758877	0002593440
0004334017	0020707907	0002069862	0002648285
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FCC Registration Number for Tariff 5 Participants

0004194270	0003774320	0003742954	0002072668
0004960332	0005075643	0003708054	0003719929
0001630532	0004975199	0001521241	0004335808
0011396082	0001952555	0004980421	0003746013
0004955837	0005084058	0002720977	0001730142
0003732575	0003737384	0001792696	0004924866
0004924866	0001607175	0004327011	0004280665
0002587863	0002588333	0006764948	0002898724
0002333888	0001648039	0001731785	0004309522
0001687557	0003745130	0003774338	0004981114
0003749561	0004337002	0004313342	0005065552
0004979555	0005017439	0001960962	0004274007
0004329652	0004314050	0001562388	0002549665
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0005010996	0005010996	0005069232	0003716263
0004339404	0003729316	0003729316	0004984845
0003774430	0001912138	0005069323	0003744463
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0002335099	0005069299	0002477503	0005078258
0004927802	0018570812	0002430510	0003770815
0001685718	0001603042	0004966354	0004269718
0002592640	0003758109	0002924629	0004984670
0002557742	0003784477	0003784477	0004976494
0003646213	0002713626	0004976932	0001549914
0004333266	0004327219	0004956652	0004957528
0001730126	0003749645	0003936994	0004331070
0004333043	0002586998	0002589307	0002592426
0001886977	0002645612	0002592392	0001792621
0001792621	0002592384	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
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
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