

**NEVADA BELL TELEPHONE COMPANY (NBTC)**  
**2020 ANNUAL FILING**  
**3RD QUARTER FEDERAL UNIVERSAL SERVICE FUND (FUSF) ADJUSTMENTS**  
**HOLDING COMPANY ACCESS RECOVERY CHARGE (ARC)**

**DESCRIPTION AND JUSTIFICATION**  
**FCC No. 1, Transmittal No. 324**  
**June 16, 2020**

**Section**

1. Introduction

**2020 ANNUAL FILING**

2. Exogenous Cost Development ( $\Delta Z$ )
  - A. Telecommunications Relay Service (TRS) Fund
  - B. Regulatory Fee Payment
  - C. Summary of Exogenous Costs & Distributions
3. Other Price Cap Index Factors/Variables Development
4. Development of 2019 Base Period Demand
5. Common Line Basket Rate Development
6. Special Access Basket PCI, API, SBI and Rate Development
7. Part 69 Waivers
8. New Services Included in the Price Cap Indices
9. Services Excluded from Price Caps
10. IND-1 Reference
11. Rate Comparison
12. Exhibits

**3RD QUARTER FEDERAL UNIVERSAL SERVICE FUND (FUSF) ADJUSTMENTS**

13. 3rd Quarter Universal Service Fund Adjustments
14. Exhibits

**HOLDING COMPANY ACCESS RECOVERY CHARGE (ARC)**

15. ARC Development and Application

16. Exhibits

## 1. INTRODUCTION

This filing is being made in compliance with the following:

- ❑ In the Matter of July 1, 2020 Annual Access Charge Tariff Filings, DA 20-413 (Filing Dates), released April 15, 2020;
- ❑ In the Matter of Material to be Filed in Support of 2020 Annual Access Tariff Filings, DA 20-502 (Tariff Review Plans), released May 12, 2020;
- ❑ In the Matter of Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities Structure and Practices of the Video Relay Service Program DA 19-607, released June 28, 2019;
- ❑ In the Matter of Assessment and Collection of Regulatory Fees for the Fiscal Year 2019, FCC 19-83, released August 27, 2019;
- ❑ In the Matter of Connect America Fund and Developing an Unified Intercarrier Compensation Plan, ICC Clarification Order, DA 14-434, released March 31, 2014;
- ❑ In the Matter of Connect America Fund WC Docket No. 10-90, A National Broadband Plan for Our Future GN Docket No. 09-51, Establishing Just and Reasonable Rates for Local Exchange Carriers WC Docket No. 07-135, High-Cost Universal Service Support WC Docket No. 05-337, Developing an Unified Intercarrier Compensation Regime CC Docket No. 01-92, Federal-State Joint Board on Universal Service CC Docket No. 96-45, Lifeline and Link-Up WC Docket No. 03-109, Universal Service Reform – Mobility Fund WT Docket No. 10-208, Order (June 5, 2012 Order), FCC 11-161, released June 5, 2012;
- ❑ In the Matter of Connect America Fund WC Docket No. 10-90, A National Broadband Plan for Our Future GN Docket No. 09-51, Establishing Just and Reasonable Rates for Local Exchange Carriers WC Docket No. 07-135, High-Cost Universal Service Support WC Docket No. 05-337, Developing an Unified Intercarrier Compensation Regime CC Docket No. 01-92, Federal-State Joint Board on Universal Service CC Docket No. 96-45, Lifeline and Link-Up WC Docket No. 03-109, Universal Service Reform – Mobility Fund WT Docket No. 10-208, Report and Order and Further Notice of Proposed Rulemaking (USF/ICC Transformation Order), FCC 11-161, released November 18, 2011;

- In the Matter of Access Charge Reform, Price Cap Performance Review for Local Exchange Carriers, Low-Volume Long Distance Users and Federal-State Joint Board on Universal Service, Sixth Report and Order CC Docket Nos. 96-262 and 94-1, Report and Order CC Docket No. 99-249 and Eleventh Report and Order CC Docket No. 96-45, (*CALLS Order*), FCC 00-193, released May 31, 2000;
- In the Matter of Thousand-Block Number Pooling, Report and Order and Second Order on Reconsideration, CC Docket No. 96-98 and CC Docket No. 99-200, released December 28, 2001;
- In the Matter of Defining Primary Lines, Report and Order & Further Notice of Proposed Rulemaking, CC Docket No. 97-181, released March 10, 1999;
- In the Matter of Access Charge Reform, Price Cap Performance Review for Local Exchange Carriers, Transport Rate Structure, Second Order on Reconsideration and Memorandum Opinion and Order, CC Docket Nos. 96-262, 94-1, and 91-213, released October 9, 1997;
- In the Matter of Access Charge Reform, Price Cap Performance Review for Local Exchange Carriers, Transport Rate Structure and Pricing, and End User Common Line Charges, Order on Reconsideration, CC Docket Nos. 96-262, 94-1, 91-213 and 95-72, released July 10, 1997;
- In the Matter of Access Charge Reform, Price Cap Performance Review for Local Exchange Carriers, Transport Rate Structure and Pricing, and End User Common Line Charges, Errata, CC Docket Nos. 96-262, 94-1, 91-213 and 95-72, released June 4, 1997;
- In the Matter of Federal-State Joint Board on Universal Service, Errata, CC Docket No. 96-45, released June 4, 1997;
- In the Matter of Federal-State Joint Board on Universal Service, Report and Order, CC Docket No. 96-45, released May 8, 1997;
- In the Matter of Access Charge Reform, Price Cap Performance Review for Local Exchange Carriers, Transport Rate Structure and Pricing, and End User Common Line Charges, First Report and Order, CC Docket Nos. 96-262, 94-1, 91-213 and 95-72, released May 16, 1997;
- In the Matter of Price Cap Regulation of Local Exchange Carriers Rate-of-Return Sharing and Lower Formula Adjustment, Report and Order, CC Docket No. 93-179, released April 14, 1995;

- In the Matter of Price Cap Performance Review for Local Exchange Carriers, First Report and Order, (*Price Cap Review Order*), CC Docket No. 94-1, released April 7, 1995;
- In the Matter of Access Charge Reform, Notice of Proposed Rulemaking, Third Report and Order, and Notice of Inquiry, CC Docket No. 96-262, released December 24, 1996, paragraph 305 (removing lower service band limits);
- In the Matter of Amendment of Part 36 of the Commission's Rules and Establishment of a Joint Board, Report and Order, CC Docket No. 80-286, released February 3, 1997;
- In the Matter of Responsible Accounting Office Letter 20, Uniform Accounting for Postretirement Benefits Other Than Pensions in Part 32, Memorandum Opinion and Order and Notice of Proposed Rulemaking, (*RAO 20 Order*), CC Docket No. 96-22, released March 7, 1996;
- In the Matter of Transport Rate Structure and Pricing, Second Report and Order, CC Docket No. 91-213, released January 31, 1994;
- In the Matter of Amendments of Part 69 of the Commission's Rules Relating to Creation of Access Charge Subelements for Open Network Architecture, Report and Order & Order on Further Reconsideration, CC Docket 89-79, released July 11, 1991;
- In the Matter of Policy and Rules Concerning Rates for Dominant Carriers, Order on Reconsideration, CC Docket 87-313, released April 17, 1991 (*LEC Price Cap Reconsideration Order*);
- In the Matter of Policy and Rules Concerning Rates for Dominant Carriers, Second Report and Order, CC Docket 87-313, released October 4, 1990 (*LEC Price Cap Order*); and
- Parts 61 and 69 of the Commission's Rules as stated herein.

This filing is comprised of three sections. The first section contains supporting documentation for the Price Cap 2020 Annual Filing. The *LEC Price Cap Order* requires an annual access tariff filing in which Price Cap companies are required to adjust the price cap indices (PCIs) for each basket of services, based on the change in the Gross Domestic Product Price Index (GDP-PI), a transitional mechanism (x-factor) and exogenous cost changes.

The second portion of this filing contains supporting documentation to implement the 3rd quarter USF factor.

The final portion of this filing contains supporting documentation for development of AT&T's Access Recovery Charge (ARC) established in the *USF/ICC Transformation Order*.

## **2020 ANNUAL FILING**

### **2. EXOGENOUS COST DEVELOPMENT - ( $\Delta Z$ )**

Part 61.45(a) of the *Code of Federal Regulations (CFR)* requires that local exchange carriers (LECs) adjust their PCIs to reflect the dollar effect of the exogenous cost changes ( $\Delta Z$ ) described in Part 61.45(d). According to Part 61.45(b), this dollar effect must be measured at the base period level of operations.

In the 2020 Annual Filing, the following exogenous adjustments will be made. All are allowable in accordance with the Commission's Part 61 Rules or were designated in Commission Orders:

- Telecommunications Relay Service (TRS)
- Regulatory Fee Payment Exogenous

Part 61.45(d)(3) requires that exogenous cost changes be apportioned between price cap services and excluded services. The exogenous cost changes were adjusted to remove impacts associated with services that are excluded from price cap regulation, to the extent that revenues for these services existed and were identifiable.

## **2.A TELECOMMUNICATIONS RELAY SERVICES (TRS) FUND**

The Commission has also ruled Telecommunications Relay Service (TRS) fund payments<sup>1</sup> may be treated as exogenous. NBTC is estimating the total TRS contribution amount for the ensuing tariff period based on the factor of \$.02779. The development of the TRS exogenous cost for this filing is provided in *Exhibit 2.5*.

## **2.B REGULATORY FEE PAYMENTS EXOGENOUS ADJUSTMENTS**

The filing for exogenous treatment of Regulatory Fees is consistent with Parts 61.45(a) and 61.45(d)(1)(vi) and the Common Carrier Bureau's October 7, 1994 *Order*.<sup>2</sup> NBTC is estimating the total Regulatory Fees for the ensuing tariff period based on a factor of \$.00317. The regulatory fee payments and the corresponding exogenous adjustment are estimated based upon the proposed factor and revenue. The exogenous adjustment is detailed in *Exhibit 2.5*.

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<sup>1</sup> *In the Matter of Telecommunications Relay Service, and the Americans with Disabilities Act of 1990*, CC Docket No. 90-571, *Second Order on Reconsideration and Fourth Report and Order*, released September 29, 1993, paragraph 18.

<sup>2</sup> *Price Cap Treatment of Regulatory Fees Imposed by Section 9 of the Communications Act Order*, (DA 94-1119) (Common Carrier Bureau, released October 7, 1994), (Erratum released November 2, 1994) paragraph 6, granting a waiver to permit exogenous cost treatment of regulatory fees.

## **2.C SUMMARY OF EXOGENOUS COSTS & DISTRIBUTIONS**

Part 61.45(d) (4) requires that exogenous cost changes be apportioned between price cap services and excluded services. The combined exogenous cost changes have been adjusted to remove impacts associated with services that are excluded from price cap regulation, to the extent that revenues for these services existed and were identifiable. The costs associated with non-price cap services, included in Parts 36 and 69 costs, are not identifiable. It is assumed that the costs for these services are equivalent to the revenue from these services. A percentage of exogenous costs are equivalent to the percentage of total identifiable interstate access and Interexchange services revenue representing non-price cap service revenue. Totals of all exogenous costs applied in this filing are summarized on *Exhibit 2.6*.

## **3. OTHER PRICE CAP INDEX FACTORS/VARIABLES DEVELOPMENT**

The annual filing adjustments to the PCI, detailed in Part 61.45(a), require the identification or development of the factors<sup>3</sup> contained in the PCI formulas. The development of these factors, except for  $\Delta Z$ , is described in this Section. The development of the  $\Delta Z$  factor is described in Section 2.

These factors are used to calculate a new PCI for each of the price cap baskets. The new PCIs are the benchmark against which the price cap basket Actual Price Indices (APIs), associated with the proposed prices, are measured. The change in the PCI also affects the calculation of the allowable Service Band Index (SBI) Upper Limits, which are used to demonstrate if the proposed service category rates are in-band for the Special Access basket. The change in the

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<sup>3</sup> The required factors are  $PCI_{t-1}$ , GDP-PI, X, R, g, w, and  $\square Z$ .

PCI also affects the allowable Sub-Index upper limits for Special Access DS1, DS3 and Zone Density Pricing (ZDP) categories.

The calculations of the PCIs are detailed on form PCI-1 of the Tariff Review Plan (TRP).

### **EXISTING PCI**

The PCI<sub>t-1</sub> is described in Part 61.45(c) as "the immediately preceding PCI value." For purposes of the 2020 Annual Filing, the immediately preceding PCIs are identified in the existing PCI column of the TRP. The reference document, which is required to identify the transmittal associated with each of the existing PCIs, is provided as *Exhibit 10*.

### **SPECIAL ACCESS AND INTEREXCHANGE REDUCTIONS**

No reductions are required in the Special Access Service pursuant to Part 61.45(b)(iv).

### **GDP-PI**

The GDP-PI factor is described in Part 61.45(c) as "the percentage change in the GDP-PI between the quarter ending six months prior to the effective date of the new annual tariff and the corresponding quarter of the previous year."

The GDP-PI for the 2020 Annual Filing is 1.6187 percent.

### **X FACTOR**

The x-factor for the Special Access basket is set 2 percent.

## **'R' VARIABLE**

The 'R' variable, as described in Part 61.45 (b)(1)(i), is calculated by multiplying base period quantities by the rates that were in effect at the time of the last PCI update.

The base period is defined in Part 61.3 (g) as "the 12-month period ending six months prior to the effective date of annual price cap tariffs." For purposes of this filing, the base period is the calendar year 2019.

## **COMMON LINE USAGE GROWTH (g)**

The Minutes of Use (MOU) Carrier Common Line (CCL) charges are zero, which eliminates the need to calculate a (g) factor.

## **4. DEVELOPMENT OF 2019 BASE PERIOD DEMAND**

Historical base period demand is required for the Common Line and Special Access baskets. Demand information for these baskets is detailed on exhibits provided with this filing. Historical base period demand for the Special Access Basket reflects the removal of demand in MSAs that have been granted Phase II regulatory relief.<sup>4</sup>

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<sup>4</sup> MO&O, CCB/CPD No. 00-26, DA 01-670, released March 14, 2001; MO&O, CCB/CPD No. 01-32, DA 02-823, released April 11, 2002; and MO&O, WCB/Pricing No. 03-8, DA 03-1721, released May 15, 2003 MO&O, CCB/CPD No. 00-25, DA 01-670, released March 14, 2001; MO&O, CCB/CPD No. 01-35, DA 02-823, released April 11, 2002.

## **5. COMMON LINE BASKET RATE DEVELOPMENT**

The Common Line Basket rates were developed in accordance with Part 69.152.

## **6. SPECIAL ACCESS BASKET PCI, API, SBI AND RATE DEVELOPMENT**

In accordance with Parts 61.45(a), 61.46(a), 61.47(a), 61.47(b) and 61.47(e), the determination of the proposed Special Access Basket rates, PCI, API, SBI and SBI Upper Limits for each of the service categories or sub categories of Voice Grade, Audio & Video, and High Cap & DDS associated with the 2020 Annual Filing are developed using 2019 base period demand. The 2020 Annual Filing PCI calculation is detailed on the IND-1, PCI-1, and RTE-1 forms of the TRP.

## **7. PART 69 WAIVERS**

The following is a list of Part 69 waivers involving Southwestern Bell Telephone Company (SWBT), Pacific Bell Telephone Company (PBTC), NBTC, Ameritech Operating Companies (Ameritech), and BellSouth Telecommunications, LLC (BellSouth), collectively the AT&T Companies, including a citation to the Order granting the waiver and the basket and service category, if applicable, and the treatment of rate elements created by the waiver:

- Ameritech, PBTC, NBTC, SWBT, BellSouth – Order (DA 17-443), released May 10, 2017, granting permission to waive of the requirement that price cap incumbent local exchange carriers (LECs) file short form Tariff Review Plans (TRPs).
- Ameritech, PBTC, NBTC, SWBT – Order (DA 05-1607), released June 6, 2005, granting permission to waive True IP to PSTN (TIPTop) services from price caps for the 2005 Annual access tariff filing requirements.
- Ameritech, BellSouth, PBTC, SWBT – Order (DA 96-2004) released December 2, 1996, granting waiver of Parts 69.110, 69.111 and 69.112 to establish new rate elements associated with a new SONET-based switched transport service. These charges are included in the HiCap Service Category of the Trunking Basket. NBTC does not offer SONET-based switched transport.

- Ameritech – Order (DA 96-446) released March 27, 1996, to establish unbundled rate elements for SS7 service. These rate elements are included in the Traffic Sensitive and Trunking baskets. BST, NBTC, PBTC, and SWBT do not offer TCAP and ISUP usage rates.
- Ameritech, BellSouth, NBTC, PBTC, SWBT – Order (DA 94-1350) released November 30, 1994, granting establishment of a new rate element for 500 Access Service. The service is included in the Local Switching Service Category of the Traffic Sensitive Basket.
- AT&T ILECs - Bureau Order, released July 23, 1993, granting a blanket waiver of Part 69 of the Commission Rules to enable all Local Exchange Carriers to tariff interstate access elements that reasonably reflect facility arrangements for transport between the Telecommunications Relay Service (TRS) service bureau and associated tandem switches, until October 31, 1995, when the interim local transport structure is scheduled to be replaced. These rate elements are included in the HiCap Service Category of the Trunking Basket.
- Ameritech - *Order*, released February 12, 1992, granting permission to assess the Ameritech Directory Search (ADS) rates, formerly Electronic Directory Search. These rate elements are included in the Information Service Category of the Traffic Sensitive Basket.
- AT&T ILECs - *Ameritech DNAL Waiver Order* (DA 91-1629), released December 27, 1991; *BOC DNAL Order* (DA 92-199), released January 30, 1992, *PBTC & NBTC Memorandum Opinion and Order* (DA 92-271), released March 6, 1992 granting establishment of sub-elements in the Switched Access transport rate element to recover the costs associated with a Dedicated Network Access Line (DNAL) Basic Service Arrangement (BSA). This rate element is included in the Local Switching Category of the Traffic Sensitive Basket.
- AT&T ILECs - Commission Order, released October 9, 1991, granting establishment of an Information Surcharge rate element within the Information Category. This rate element is included in the Traffic Sensitive Basket.
- AT&T ILECs – *Operator Services Waiver Order* (DA 91-274), released March 5, 1991. The Commission established a blanket waiver for all carriers who provide operator services to include Line Status Verification, Call Interruption and Operator Transfer. The Commission did not specify applicable price cap baskets or service categories in the waiver.
- AT&T ILECs - Bureau MO&O, released September 28, 1988, granting establishment of a rate element for the recovery of costs incurred in the provision of 900 Access Service. This rate element is included in the Local Switching Service Category of the Traffic Sensitive Basket.
- AT&T ILECs - Order, released September 3, 1987, granting permission to determine the Message Unit Credit (MUC) on a statewide basis instead of an exchange basis, as stated in Part 69.106(c). The waiver was extended via the 1989 and 1990 Waiver Orders. This charge is included in the Local Switching Service Category of the Traffic Sensitive Basket.

- AT&T ILECs - Commission MO&O (FCC 83–356), released August 22, 1983, established the \$25.00 Special Access Surcharge (waiving Part 69.115 (c)) for private line subscribers who actually leak traffic into the local network. This grant was extended in the 1985 Waiver Order, released June 7, 1985, and again addressed in the 1989 Waiver Order, released December 2, 1988, granting waiver in force pending resolution of the Special Access Surcharge issues. This rate element is included in the Common Line Basket.

## **8. NEW SERVICES INCLUDED IN THE PRICE CAP INDICES**

No new services were added in 2019.

## **9. SERVICES EXCLUDED FROM PRICE CAPS**

The Commission's Order, *In the Matter of Material to be Filed in Support of 2001 Annual Access Tariff Filings (2001 TRP Order)*, released April 30, 2001, required LECs, for the first time, to provide support documentation detailing services excluded from price cap regulation. In *Exhibit 9*, NBTC has included a list of all services excluded from price cap regulation, which has been revised to reflect activity subsequent to the 2019 Annual Filing in accordance with the *2020 TRP Order*.

## **10. IND-1 REFERENCE**

The reference document, which is required to identify the transmittal associated with each of the existing PCIs, is provided as *Exhibit 10*.

## **11. RATE COMPARISON**

*Exhibit 11* identifies current and proposed rates for elements with changing rates. In addition to this exhibit, a Rate Detail file which lists all price cap services demand and revenues by service basket is provided.

## **12. EXHIBITS**

This section provides the exhibits and other support documents referenced in prior sections of the D&J.

- Exhibit 2.5 – Telecommunications Relay Service and Regulatory Fee Exogenous
- Exhibit 2.6 – Summary of Exogenous Costs & Distribution
- Exhibit 9 – Excluded Services List
- Exhibit 10 – IND-1 Reference
- Exhibit 11 – Rate Comparison
- Tariff Review Plan (TRP)
- Rate Detail File

## **3RD QUARTER FEDERAL UNIVERSAL SERVICE FUND (FUSF) ADJUSTMENTS**

### **13. 3RD QUARTER UNIVERSAL SERVICE FUND ADJUSTMENTS**

This portion of the filing is to revise the USF obligation based on the 3rd quarter 2020 contribution factor, which NBTC will begin billing July 1, 2020. The 3rd quarter contribution factor, 26.5 percent, was provided in the Commission's recent Public Notice, DA 20-617, released June 12, 2020. Recovery of this contribution is allowable pursuant to Part 69.158. The methodology used to calculate end user charges assessed to recover this liability is detailed below.

#### **Calculation of the Federal Universal Service Fund Flat Rate End User Charge**

To ensure compliance with the Commission's *Interim Contribution Methodology Order*, NBTC recovers its USF obligation associated with switched access services through various flat-rate end user charges.<sup>5</sup> The charges will be assessed with respect to the interstate end user service that generates the USF obligation.

NBTC assesses three general types of USF charges (Basic, Port, and Non-recurring) for switched access customers. These charges are calculated using the following methodology as shown on *Exhibit 13.1* and *Exhibit 13.2*.

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<sup>5</sup>See *Federal-State Joint Board on Universal Service, 1998 Biennial Regulatory Review – Streamlined Contributor Reporting Requirements Associated with Administration of Telecommunications Relay Service, North American Numbering Plan, Local Number Portability, and Universal Service Support Mechanisms, Telecommunications Services for Individuals with Hearing and Speech Disabilities, and the Americans with Disabilities Act of 1990, Administration of the North American Numbering Plan and North American Numbering Plan Cost Recovery Contribution Factor and Fund Size, Number Resource Optimization, Telephone Number Portability*, CC Docket Nos. 96-45, 98-171, 90-571, 92-237, 99-200, 95-116,, 98-170, *Report and Order and Second Further Notice of Proposed Rule Making*, 17 FCC RCD 24952 (2202) (*Interim Contribution Methodology Order*).

## **Basic USF Recovery Charges**

These charges are assessed to switched access lines to recover the USF obligation associated with the assessment of End User Common Line (EUCL) and End User Port charges.

## **Residential / Single Line Business (SLB)**

NBTC develops the Basic USF charge for residential and single line business customers by multiplying EUCL charges assessed to these customers by the relevant contribution factor released by the Commission. The calculation for the Basic FUSF Residential/Single Line Business rate is demonstrated in *Exhibit 13.1*.

## **BRI ISDN / BRI ISDN Port**

NBTC develops the Basic USF charge for BRI ISDN by adding the BRI ISDN EUCL rate to the BRI ISDN LINE PORT rate, to arrive at the TOTAL BRI ISDN basic interstate revenue. The TOTAL BRI ISDN interstate revenue is then multiplied by the relevant contribution factor released by the Commission. The calculation for the BRI ISDN USF Recovery Charge is demonstrated in *Exhibit 13.1*.

## **Multi Line Business, PRI ISDN, and Centrex**

NBTC elected to utilize the provisions granted in the Commission's *Order and Second Order on Reconsideration* regarding Centrex customers.<sup>6</sup> A portion of the un-recovered obligation created

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<sup>6</sup> See *Federal-State Joint Board on Universal Service, 1998 Biennial Regulatory Review – Streamlined Contributor Reporting Requirements Associated with Administration of Telecommunications Relay Service, North American Numbering Plan, Local Number Portability, and Universal Service Support Mechanisms, Telecommunications Services for Individuals with Hearing and Speech Disabilities, and the Americans with Disabilities Act of 1990, Administration of the North American Numbering Plan and North American Numbering Plan Cost Recovery Contribution Factor and Fund Size, Number Resource Optimization, Telephone Number Portability*, CC Docket Nos. 96-45, 98-171, 90-571, 92-237, 99-200, 95-116, 98-170, *Order and Second Order on Reconsideration*, FCC 03-58, para. 3 (rel. March 14, 2003).

from using the PICC equivalency ratios for Centrex customers is applied to Multi-line business customers. However, due to the constraints included in the Commission's *Order*, NBTC averages the obligation associated with End User Common Line (EUCL) charges for Centrex customers. Centrex customers are assessed the full amount of the obligation associated with their SPNP end user surcharges.

NBTC determines the Basic USF recovery rate for business customers using the method detailed below.

### **Establish the Basic Multi-Line Business Rate**

**Step 1** – Determine total revenue using access lines as of March 2020 for these customers generated from EUCL assessments by multiplying the EUCL rate by the number of lines.

**Step 2** – Multiply the result from Step 1 by the contribution factor to obtain the obligation associated with the customer base.

**Step 3** – Divide the obligation developed in Step 2 by the number of billable lines (using lines as of March 2020). The line base is adjusted using PICC equivalency ratios as defined in Part 69.153. The result is the Basic MLB rate per line.

**Step 4** – Add to the Basic MLB rate, all other USF recovery associated with the customer type. Step 4 is calculated by customer type for Multi-line business, PRI ISDN, and Centrex customers as shown in *Exhibit 13.2*.

The final rates per customer type are detailed on both *Exhibit 13.1* and *Exhibit 13.2*. These final rates preclude any USF recovery necessary from non-recurring interstate end user charges.

### **Other Non-recurring USF Surcharges**

Non-recurring USF surcharges are assessed to interstate end user non-recurring charges, which generate a USF obligation. NBTC calculates Other Non-recurring USF charges by multiplying the non-recurring charge by the contribution factor. These USF recovery charges will only be assessed per occurrence of the interstate end user non-recurring charge. For billing purposes, the USF recovery charge may be added to the existing interstate end user charge, which generates the obligation.

NBTC assesses Lifeline customers the Non-recurring USF charges when they are assessed the non-recurring charge that generates the obligation. NBTC also assesses Interexchange Carriers (ICs) the Presubscribed Interexchange Change (PIC) USF Charge when the IC is assessed the PIC change charge.

### **Other Recurring Federal Universal Fund Surcharges**

NBTC will continue to recover its other recurring (i.e. Special Access and True Internet Protocol to Public Switched Telephone Network (TIPToP Service)) USF obligations through a percentage-based USF recovery charge applied to interstate end user billed revenues. This percentage-based USF recovery charge is set equal to the Commission's contribution factor released via Public Notice.

## 14. EXHIBITS

This section provides the exhibits and other support documents referenced in prior sections of the D&J.

- Exhibit 13.1 – Universal Service Fee Rate Development 1
- Exhibit 13.2 – Universal Service Fee Rate Development 2

## **HOLDING COMPANY ACCESS RECOVERY CHARGE (ARC)**

### **15. ARC DEVELOPMENT AND APPLICATION**

AT&T has chosen to calculate the ARC once at the holding company level while each AT&T incumbent local exchange carrier (ILEC) must file all supporting documents separately to comply with the requirements of the *Tariff Review Plan* order. As a result, the required exhibits for this Holding Company ARC section are the same in all five transmittals filed separately by the AT&T ILECs.

Price cap carriers like the ILECs are permitted to recover a limited portion of their Eligible Recovery from their end users through a monthly fixed charge called Access Recovery Charge (ARC). Section 51.915(e)(1) of the FCC's proposed rules defines ARC as:

A charge that is expressed in dollars and cents per line per month may be assessed upon end users that may also be assessed an end user common line charge pursuant to § 69.152 of the chapter, to the extent necessary to allow the Price Cap Carrier to recover some or all of its eligible recovery determined pursuant to paragraph 51.915(d), subject to the caps described in paragraph 51.915(e)(5). A Price Cap Carrier may elect to forgo charging some or all of the Access Recovery Charge.

AT&T, a Price Cap Carrier Holding Company, is allowed to recover eligible recovery attributable to any of the 21 price cap study areas operated by its wholly-owned operating companies through assessment of the ARC on end users in any of those price cap study areas, all of which are operating as price cap ILECs. However, distribution of ARC among different types of lines should follow rules outlined in Section 51.915(e)(4) of the *USF/ICC Transformation Order*. Per that rule, AT&T Holding Company may not recover a higher fraction of its total eligible revenue recovery from ARC assessed on Residential and Single Line Business lines than

their share of Total Weighted Lines where Multi-Line Business lines gets twice the weight (i.e. Total Weighted Lines = Residential Lines + Single-Line Business Lines+ (2 X Multi-Line Business Lines)).

- For purposes of distribution of ARC among different types of lines, the AT&T ILECs' Residential and Single Line Business lines are lines (other than lines of Lifeline Customers) assessed the residential and single line business end user common line charge and lines assessed the non-primary residential EUCL charge.
- AT&T ILECs' Multi-Line Business Lines are lines assessed the multi-line business end user common line charge.

As shown on *Exhibit ATTTTER19* and summarized on *Exhibit ICC SUM-1*, AT&T's access recovery charges are calculated per Section 51.915 (d)(viii) of the 2011 Transformation Order as shown below:

“51.915 (d)(viii) : Beginning July 1, 2019, and in subsequent years, a Price Cap Carrier's eligible recovery will be equal to the amount calculated in paragraph (d)(1)(vii)(A) through (d)(1)(vii)(H) of this section before the application of the Price Cap Carrier Traffic Demand Factor applicable in 2018 multiplied by the appropriate Price Cap Carrier Traffic Demand Factor for the year in question, and then adding an amount equal to True-up Revenues for Access Recovery Charges for the year beginning July 1 two years earlier.”

Beginning July 1, 2020, AT&T's eligible recovery will be equal to the eligible recovery filed in 2018 multiplied by 2020 Price Cap Carriers Traffic Demand Factor and then adding an amount equal to 2018 True-Up Revenues for Access Recovery Charges.

The eligible recovery amounts from each of the 21 states are aggregated up to the AT&T Holding Company level and as shown on each state's *Exhibit ARC-NO CAF-1*<sup>7</sup> and *Exhibit ARC-NO CAF-2*, distributed among lines of different types using the criteria outlined in Section 51.915(e)(4).<sup>8</sup>

Billing constraints and the availability of granular E-911 charges restricts AT&T's ability to implement exchange level Residential and Single-Line Business ARC. As a result, AT&T will spread the recovery of Eligible Recovery among a subset of end-users.<sup>9</sup> For the July 2020 through June 2021 tariff period, AT&T has decided not to charge ARC to residential and single-line business customers in all states except in Illinois. AT&T will continue to charge ARC to multi-line business customers in all 21 ILEC study areas.

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<sup>7</sup> Each state's form is labeled as Exhibit ARC-NO CAF-1 xx, where xx equals the state abbreviation.

<sup>8</sup> A Price Cap carrier holding company that does not receive ICC-replacement CAF support may not recover a higher fraction of its total revenue recovery from Access Recovery Charges assessed on Residential and Single Line Business lines than:

- A. The number of Residential and Single-Line Business lines divided by
- B. The sum of the number of Residential and Single-Line Business lines and two times the number of Multi-Line Business lines.

<sup>9</sup> We permit carriers to determine at the holding company level how Eligible Recovery will be allocated among their incumbent LECs' ARCs. By providing this flexibility, carriers will be able to spread the recovery of Eligible Recovery among a broader set of customers, minimizing the increase experienced by any one customer. This also will enable carriers to more fully recover Eligible Recovery from end-users with rates below the \$30 Residential Rate Ceiling, limiting the potential impact on the CAF (Paragraph 910).

The total AT&T ILEC reduction determined pursuant to § 51.907(b)(2) is projected to be \$311.3M. The Net CMRS Reciprocal Compensation Revenue reduction is projected to be \$19.2M. The amount equal to True-up Revenues for Access Recovery Charge is \$3.5M, which is calculated by exchange on *Exhibit ARC-TUP-1* and summarized by state on *Exhibit ARC-TUP-2*. AT&T has elected to forgo the recovery for net non-CMRS reciprocal compensation per the option outlined in Section 51.915(d)(3) of the Rules. As a result, the total Eligible Recovery Revenue pursuant to 51.915(d)(1)(i) of the Rules (after adjusting for CALLS Study Area Base Factor and Price Cap Carriers Traffic Demand Factor) is \$111.7 M.

Per Paragraph 911 of the *USF/ICC Transformation Order*, AT&T could have allocated **30** percent of the Eligible Recovery to Residential Lines (that includes Single-Line Business and BRI-ISDN) and **70** percent to Multi-Line Business Lines. However, due to residential rate ceiling constraints, the Eligible Recovery allocated to Residential (including Single-Line Business and BRI-ISDN) is only 7 percent, or \$ 7.8 M, and the Eligible Recovery for Multi-Line Business is 93 percent, or \$103.9 M.

Given the ARC rates filed with this tariff and projected line count for this tariff period, AT&T's Expected ARC Revenue from Residential Lines and Single Line Business will be \$7.8 M and from Multi-Line Business Lines \$ 103.9M.

Currently, AT&T ILECs are not receiving any ICC-CAF funding. However, AT&T is still required to file one additional form called Rate Ceiling Calcs spreadsheet, which is attached to the *Tariff Review Plan*. As a result, *Exhibit ARC-NO-CAF-3* is included in the filing package.

*Exhibits ARCRCTRP-NO CAF-1<sup>10</sup>* and *ARCRCTRP-NO CAF-2* provide the required Tariff Rate Comparisons.

## 16. EXHIBITS

- Exhibit ATTTTER20 - Total Eligible Recovery Step 4
- Exhibit ICC SUM-1 - Eligible ARC/ARC Recovery

### **Ameritech Operating Companies (Ameritech) Tariff FCC No. 2**

- Exhibit ARC-NO CAF-1 IL - Illinois ARC Form
- Exhibit ARC-NO CAF-1 IN - Indiana ARC Form
- Exhibit ARC-NO CAF-1 MI - Michigan ARC Form
- Exhibit ARC-NO CAF-1 OH - Ohio ARC Form
- Exhibit ARC-NO CAF-1 WI - Wisconsin ARC Form

### **BellSouth Telecommunications, LLC (BellSouth) Tariff FCC No. 1**

- Exhibit ARC-NO CAF-1 AL - Alabama ARC Form
- Exhibit ARC-NO CAF-1 FL - Florida ARC Form
- Exhibit ARC-NO CAF-1 GA - Georgia ARC Form
- Exhibit ARC-NO CAF-1 KY - Kentucky ARC Form
- Exhibit ARC-NO CAF-1 LA - Louisiana ARC Form
- Exhibit ARC-NO CAF-1 MS - Mississippi ARC Form
- Exhibit ARC-NO CAF-1 NC - North Carolina ARC Form
- Exhibit ARC-NO CAF-1 SC - South Carolina ARC Form
- Exhibit ARC-NO CAF-1 TN - Tennessee ARC Form

### **Nevada Bell Telephone Company (NBTC) Tariff FCC No. 1**

- Exhibit ARC-NO CAF-1 NV - Nevada ARC Form

### **Pacific Bell Telephone Company (PBTC) Tariff FCC No. 1**

- Exhibit ARC-NO CAF-1 CA - California ARC Form

### **Southwestern Bell Telephone Company (SWBT) Tariff FCC No. 73**

- Exhibit ARC-NO CAF-1 AR - Arkansas ARC Form
- Exhibit ARC-NO CAF-1 KS - Kansas ARC Form
- Exhibit ARC-NO CAF-1 MO - Missouri ARC Form
- Exhibit ARC-NO CAF-1 OK - Oklahoma ARC Form
- Exhibit ARC-NO CAF-1 TX - Texas ARC Form
- Exhibit ARC-NO CAF-2 - Maximum ARC Revenue Calculation
- Exhibit ARC-NO CAF-3 - Rate Ceiling No CAF
- Exhibit ARC-NO CAF-4 - Footnotes

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<sup>10</sup> Each state's form is labeled as Exhibit ARCRCTRP – NO CAF-1 xx, where xx equals the state abbreviation.

**Ameritech Operating Companies (Ameritech) Tariff FCC No. 2**

- Exhibit ARCRCTRP-NO CAF-1 IL - Illinois Tariff Rate Comparison No CAF
- Exhibit ARCRCTRP-NO CAF-1 IN - Indiana Tariff Rate Comparison No CAF
- Exhibit ARCRCTRP-NO CAF-1 MI - Michigan Tariff Rate Comparison No CAF
- Exhibit ARCRCTRP-NO CAF-1 OH - Ohio Tariff Rate Comparison No CAF
- Exhibit ARCRCTRP-NO CAF-1 WI - Wisconsin Tariff Rate Comparison No CAF

**BellSouth Telecommunications, LLC (BellSouth) Tariff FCC No. 1**

- Exhibit ARCRCTRP-NO CAF-1 AL - Alabama Tariff Rate Comparison No CAF
- Exhibit ARCRCTRP-NO CAF-1 FL - Florida Tariff Rate Comparison No CAF
- Exhibit ARCRCTRP-NO CAF-1 GA - Georgia Tariff Rate Comparison No CAF
- Exhibit ARCRCTRP-NO CAF-1 KY - Kentucky Tariff Rate Comparison No CAF
- Exhibit ARCRCTRP-NO CAF-1 LA - Louisiana Tariff Rate Comparison No CAF
- Exhibit ARCRCTRP-NO CAF-1 MS - Mississippi Tariff Rate Comparison No CAF
- Exhibit ARCRCTRP-NO CAF-1 NC - North Carolina Tariff Rate Comparison No CAF
- Exhibit ARCRCTRP-NO CAF-1 SC - South Carolina Tariff Rate Comparison No CAF
- Exhibit ARCRCTRP-NO CAF-1 TN - Tennessee Tariff Rate Comparison No CAF

**Nevada Bell Telephone Company (NBTC) Tariff FCC No. 1**

- Exhibit ARCRCTRP-NO CAF-1 NV - Nevada Tariff Rate Comparison No CAF

**Pacific Bell Telephone Company (PBTC) Tariff FCC No. 1**

- Exhibit ARCRCTRP-NO CAF-1 CA - California Tariff Rate Comparison No CAF

**Southwestern Bell Telephone Company (SWBT) Tariff FCC No. 73**

- Exhibit ARCRCTRP-NO CAF-1 AR - Arkansas Tariff Rate Comparison No CAF
- Exhibit ARCRCTRP-NO CAF-1 KS - Kansas Tariff Rate Comparison No CAF
- Exhibit ARCRCTRP-NO CAF-1 MO - Missouri Tariff Rate Comparison No CAF
- Exhibit ARCRCTRP-NO CAF-1 OK - Oklahoma Tariff Rate Comparison No CAF
- Exhibit ARCRCTRP-NO CAF-1 TX - Texas Tariff Rate Comparison No CAF
- Exhibit ARCRCTRP-NO CAF-2 - Tariff Rate Comparison No CAF

Exhibit ARCRCTRP-NO CAF-3 - Footnotes

Exhibit ARC-TUP-1 - True Up Calculation by Exchange

Exhibit ARC-TUP-2 - True Up Summary by State

Exhibit ARC-TUP-3 - Footnotes

**AT&T - NEVADA BELL TELEPHONE COMPANY**  
**Telecommunication Relay Service and Regulatory Fee**  
**Exogenous Cost Changes Detail**

<u>2018 Annual</u>	2018 Annual			
	Total	Interstate	FCC DA 19-83	FCC DA 18-680
	End User Revenues		8/27/2019	6/29/2018
	(499A)	(499A)	Regulatory Fee	Telecom Relay
	(A)	(B)	(C) = B * 0.00317	(D) = B * 0.02801
Exogenous Amount	\$ 60,616,097	\$ 12,518,037	\$ 39,682	\$ 350,630
Excluded Revenue	\$ 1,142,846	\$ 1,142,846		
Price Cap Revenue Percentage	98.11%	90.87%		

<u>2019 Mid-Year Rate Changes</u>	2019 Mid-Year Rate Changes			
			FCC DA 19-83	FCC DA 19-607
			8/27/2019	6/28/2019
			(C') = B * 0.00317	(D') = B * 0.02779
Exogenous Amount		\$ 39,682	\$ 347,876	
Difference		\$ -	(H) = (D') - (D) \$ (2,754)	
Annualized Reversal		\$ -	(I) = (H) * 12 / 9 \$ (3,672)	

<u>2019 Annual</u>	2019 Annual			
	Total	Interstate	FCC DA 19-83	FCC DA 19-607
	End User Revenues		8/27/2019	6/28/2019
	(499A)	(499A)	Regulatory Fee	Telecom Relay
	(A'')	(B'')	(C'') = B'' * 0.00317	(D'') = B'' * 0.02779
Exogenous Amount	\$ 56,962,717	\$ 12,054,983	\$ 38,214	\$ 335,008
Excluded Revenue	\$ 1,060,270	\$ 1,060,270		
Price Cap Revenue Percentage	98.14%	91.20%		

	<u>7/19 - 6/20</u>	<u>7/20 - 6/21</u>	<u>Exogenous</u>
<b>Regulatory Fee Support:</b>			
FCC DA 19-83 - 0.00317 Factor 2018 Revenue - C	\$ 39,682		
FCC DA 19-83 - 0.00317 Factor 2019 Revenue - G	\$ -		
FCC DA 19-83 - 0.00317 Factor 2019 Revenue - C''		\$ 38,214	
	\$ 39,682	\$ 38,214	
% Price Cap Allocation	90.87%	91.20%	
Price Cap Exogenous Amount	\$ 36,059	\$ 34,853	
FCC 2018 Price Cap Interstate End User Revenue	\$ 11,375,191		
FCC 2019 Price Cap Interstate End User Revenue	\$ 10,994,713		
Revenue Change ( R )	-3.34%		
Price Cap Only with R Adj	\$ 34,853	\$ 34,853	\$ -

	<u>7/19 - 6/20</u>	<u>7/20 - 6/21</u>	<u>Exogenous</u>
<b>Telecommunications Relay Service Support:</b>			
FCC DA 18-680 - 0.02801 Factor 2018 Revenue - D	\$ 350,630		
FCC DA 19-607 - 0.02779 Factor 2019 Revenue - I	\$ (3,672)		
FCC DA 19-607 - 0.02779 Factor 2019 Revenue - D''		\$ 335,008	
	\$ 346,958	\$ 335,008	
% Price Cap Allocation	90.87%	91.20%	
Price Cap Exogenous Amount	\$ 315,282	\$ 305,543	
FCC 2018 Price Cap Interstate End User Revenue	\$ 11,375,191		
FCC 2019 Price Cap Interstate End User Revenue	\$ 10,994,713		
Revenue Change ( R )	-3.34%		
Price Cap Only with R Adj	\$ 304,737	\$ 305,543	\$ 806

	<u>7/19 - 6/20</u>	<u>7/20 - 6/21</u>	<u>Exogenous</u>
			<u>Price Cap Revenue</u>
499A 2019 Annual Interstate End User Revenues	\$ 313,697,119	\$ 1,847,006	\$ 315,544,125
Allocation Basis	99.4147%	0.59%	
Regulatory Fee Support:	\$ -	\$ -	\$ -
Telecom. Relay Support	\$ 802	\$ 5	\$ 806
	\$ 802	\$ 5	\$ 806

AT&T - NEVADA BELL TELEPHONE COMPANY  
SUMMARY OF EXOGENOUS COSTS AND DISTRIBUTIONS  
TO NON-ATS SERVICES

Exhibit 2.6

LINE	DESCRIPTION	'R' VALUE (A)	DISTRIBUTION (B) = (A/LINE 9A)	EDT EXOG (C)	ITC EXOG (D)	TRS EXOG (E)	REG FEE EXOG (F)	TOTAL
1	INTERSTATE EXOGENOUS COST TO BE DISTRIBUTED (Exhibit 2.4 b)			-	-			
2	% OF EDT AND ITC EXOG COST W/EXCLUDED SERVICES EXHIBIT 2.5			0.00%	0.00%			
3	EXOGENOUS COSTS TO BE DISTRUBUTED (L1*(1-L2))			-	-	806	-	806
4	COMMON LINE EUCL AND PICC 'R' (Sum1 Column A, Row 100)	3,898,284	79.98%	-	-	802	-	802
5	SPECIAL ACCESS BASKET 'R'	975,495	20.02%	-	-	5	-	5
6	TOTAL (SUM L4 THRU L8)	4,873,779	100.00%	-	-	806	-	806

\*\*Effective 10/01/2003 TRS and Reg Fee Exogenous is only spread between the Common Line and Special Access Baskets

**AT&T - NEVADA BELL TELEPHONE COMPANY  
LIST OF TARIFFED SERVICES EXCLUDED FROM PRICE CAPS**

Tariff Section	Category	Service	MRC / NRC / Usage	Previously in Price Caps	Authority to Exclude or Remove From Price Caps
4.7	End User Charges	Federal End User Charges	MRC	No	<i>CALLS Order</i>
6.8.2	Special Construction/ICB	Call Transfer ICB	MRC	No	<i>LEC Price Cap Order</i>
6.8.2	Special Construction/ICB	Answer Supervision ICB	MRC	No	<i>LEC Price Cap Order</i>
7	Special Access	All Transport and EU Channel Terminations in Competitive wirecenters	NRC / MRC	Yes	<i>FCC 17-43 BDS Order</i>
7.7.6	Packet Services	Public Packet Switching Network (PPSN) ICB	MRC	No	<i>LEC Price Cap Order</i>
7.11.5	Special Construction/ICB	Hi Cap ICBs	NRC / MRC	No	<i>LEC Price Cap Order</i>
10.8.2	Government Services	Voice Grade Special Access ICBs	NRC / MRC	No	<i>LEC Price Cap Order</i>
10.8.2	Government Services	Wideband Digital Special Access ICBs	NRC / MRC	No	<i>LEC Price Cap Order</i>
10.8.2	Government Services	Special Routing Access Service (SRAS)	NRC / MRC	No	<i>LEC Price Cap Order</i>
10.8.2	Government Services	Telecommunications Service Priority (TSP) System	NRC / MRC	No	<i>LEC Price Cap Order</i>
10.8.2	Government Services	Government Emergency Telecommunications Services (GETS)	NRC / MRC	No	<i>LEC Price Cap Order</i>
10.8.2	Government Services	SBC Federal Access Solutions Transport (FAST)	MRC	No	<i>LEC Price Cap Order</i>
11.2	Special Construction/ICB	Special Facilities Routing of Access Services	NRC / MRC	No	<i>LEC Price Cap Order</i>
12.3	Special Construction/ICB	Specialized Services ICBs	NRC / MRC	No	<i>LEC Price Cap Order</i>
13.3.3	End User Charges	Presubscription	NRC	No	<i>LEC Price Cap Order</i>
13.3.4	Miscellaneous/Other	Jack Installation Services	NRC	No	<i>LEC Price Cap Order</i>
13.3.7	Miscellaneous/Other	Controller Arrangement ICB	MRC	No	<i>LEC Price Cap Order</i>
13.3.9	End User Charges	900 Call Blocking	NRC / MRC	No	<i>LEC Price Cap Order</i>
18	Miscellaneous/Other	Expanded Interconnection / Collocation	NRC / MRC	No	Expanded Interconnection with Local Telephone Company Facilities and Amendment of Part 36 of the Commission's Rules and Establishment of a Joint Board, CC Docket No. 91-141, Transport Phase I and CC Docket No. 8-286, Second Report and Order and Third Notice of Proposed Rulemaking released September 2, 1993.
19.5	Miscellaneous/Other	Basic SPNP Service	MRC	No	<i>In the Matter of Telephone Number Portability</i> , Third Report and Order, FCC 98-82, released May 12, 1998.
21	Miscellaneous/Other	Optical Carrier Network (OCN)	NRC / MRC	No	<i>In the Matter of Petition of AT&amp;T Inc for Forbearance Under 47 U.S.C &amp; 160(c ) from Title II and Computer Inquiry Rules with Respect to its Broadband Services, etc.</i> , Memorandum Opinion and Order, FCC 07-180, released October 12, 2007.
22	Miscellaneous/Other	Pricing Flexibility	NRC / MRC	Yes	FCC 99-206, Fifth Report and Order and Further Notice of Proposed Rulemaking ( <i>Pricing Flexibility Order</i> )
23	Miscellaneous/Other	Pricing Flexibility Contract Offerings	NRC / MRC	No	FCC 99-206, Fifth Report and Order and Further Notice of Proposed Rulemaking ( <i>Pricing Flexibility Order</i> )
24	Miscellaneous/Other	TipTop	NRC / MRC	No	Annual waivers from FCC.

	PROPOSED PCI (A)	PROPOSED API (B)	PROPOSED SBI (C)	PROPOSED SBI LIMIT (D)	EXISTING PCI (E)	EXISTING API (F)	EXISTING SBI (G)	EXISTING SBI LIMIT (H)
<b>Special Access Basket</b>								
720 VG/WATS, Met, Tgh - Special	N/A	N/A	June Filing	June Filing	N/A	N/A	Trans # 317	Trans # 317
730 Audio & Video	N/A	N/A	June Filing	June Filing	N/A	N/A	Trans # 317	Trans # 317
740 High Cap & DDS - Special	N/A	N/A	June Filing	June Filing	N/A	N/A	Trans # 317	Trans # 317
750 DS-1 SubCat - Special	N/A	N/A	June Filing	June Filing	N/A	N/A	Trans # 317	Trans # 317
751 DS1 Spec Density Zone 1	N/A	N/A	0.0000	0.0000	N/A	N/A	0.0000	0.0000
752 DS1 Spec Density Zone 2	N/A	N/A	0.0000	0.0000	N/A	N/A	0.0000	0.0000
753 DS1 Spec Density Zone 3	N/A	N/A	0.0000	0.0000	N/A	N/A	0.0000	0.0000
754 DS1 Spec Density Zone 4	N/A	N/A	0.0000	0.0000	N/A	N/A	0.0000	0.0000
755 DS1 Spec Density Zone 5	N/A	N/A	0.0000	0.0000	N/A	N/A	0.0000	0.0000
760 DS-3 SubCat - Special	N/A	N/A	June Filing	June Filing	N/A	N/A	Trans # 317	Trans # 317
761 DS3 Spec Density Zone 1	N/A	N/A	0.0000	0.0000	N/A	N/A	0.0000	0.0000
762 DS3 Spec Density Zone 2	N/A	N/A	0.0000	0.0000	N/A	N/A	0.0000	0.0000
763 DS3 Spec Density Zone 3	N/A	N/A	0.0000	0.0000	N/A	N/A	0.0000	0.0000
764 DS3 Spec Density Zone 4	N/A	N/A	0.0000	0.0000	N/A	N/A	0.0000	0.0000
765 DS3 Spec Density Zone 5	N/A	N/A	0.0000	0.0000	N/A	N/A	0.0000	0.0000
790 Wideband	N/A	N/A	0.0000	0.0000	N/A	N/A	0.0000	0.0000
899 Total Special Access	June Filing	June Filing	N/A	N/A	Trans # 317	Trans # 317	N/A	N/A

**AT&T - NEVADA BELL TELEPHONE COMPANY**  
**RATE COMPARISON**

Exhibit 11

<b>STATE</b>	<b>RATE ELEMENTS</b>	<b>CURRENT RATE</b>	<b>PROPOSED RATE</b>
NEV	DS3 CHAN TERM-3YR	\$ 900.00	\$ 870.00

**Nevada Bell Telephone Company (NBTC)**  
**Nevada Universal Service Fee (USF) Rate Development**

3rd Quarter 2020 Contribution Factor	Source <i>DA 20-617</i>	(A)	(B) <b>0.265</b>	(C=A*B)
<b>Basic USF Recovery Charge</b>				
<b><i>Residential / Single-Line Business</i></b>		<b>Rate</b>		<b>USF Charge</b>
RES Access Recovery Charge (ARC)		<b>0.00</b>		
End User Common Line (EUCL) Rate		<b>6.36</b>		
ARC & EUCL Rate Combined		\$ 6.36		\$ 1.68
<b><i>BRI ISDN</i></b>				<b>USF Charge</b>
End User Common Line/ARC Rate		\$ 6.36		
BRI ISDN Port		\$ 3.90		
Total Basic Interstate End User Revenue		\$ 10.26		\$ 2.71
<b><i>Multi-line Business</i></b>				
<b><i>PBX</i></b>	Exhibit 2			\$ 3.98
<b><i>PRI ISDN</i></b>	Exhibit 2			\$ 3.98
<b><i>CENTREX</i></b>	Exhibit 2			\$ 29.51
	Exhibit 2			\$ 0.44
<b>Other USF Recovery Charges</b>				
PIC Manual Change Charge		\$ 3.89		\$ 1.03
PIC Mechanized Change Charge		\$ 1.60		\$ 0.42

**Nevada Bell Telephone Company (NBTC)**  
**Nevada Universal Service Fee (USF) Rate Development**

3rd Quarter 2020 Contribution Factor		Source DA 20-617	(A)	(B) 0.265	(C=A*B) USF Charge
<b>Basic USF Recovery Charge for MLB, PRI, &amp; Centrex</b>					
<i>Multi-line Business, PRI ISDN, CENTREX Lines as of March 2020</i>					
L1	MLB Lines		14,122		
L2	Centrex lines with less than 9 lines		2,327		
L3	Centrex lines with greater than 9 lines		10,740		
L4	PRI ISDN		333		
	BUS Access Recovery Charge (ARC)		\$2.63		
	End User Common Line (EUCL) Rate	\$	6.36		
L5	ARC & EUCL Rate Combined		\$8.99	\$8.99	
<b>MLB, PRI ISDN, Centrex Revenue</b>					
L6	MLB	L5*L1	\$ 126,957		
L7	PRI ISDN	L5*L4*5	\$ 14,968		
L8	Centrex	(L5)*(L2+L3)	\$ 117,472		
L9	MLB, PRI ISDN, Centrex Revenue	L6:L8	\$ 259,397		
L10	MLB, PRI ISDN, Centrex Obligation	L9*USF Factor	\$ 68,740		
L11	PICC Equivalent Centrex Systems Line Counts (As stated in FCC 03-58 released March 14, 2003)			259	
L12		0 L1+(L3/9)+(L4*5)+L11		17,239	
<b>Recovery Cross Check Verification</b>					
L13	Basic MLB Rate	(L10/L12)		\$ 3.98	
L14	Basic Centrex Rate	L13/9		\$ 0.44	
L15	Basic PRI ISDN Rate (excluding Port recovery)	L13*5		\$ 19.90	
<b>Recovery Cross Check Verification</b>					
L16	Basic MLB USF Recovery	L1*L13	\$ 56,206		
L17	Basic Centrex USF Recovery	(L3*L14)+(L11*L13)	\$ 5,755		
L18	Basic PRI ISDN USF Recovery	(L5*L15)	\$ 6,627		
L19	Total MLB, PRI ISDN, Centrex Basic USF Recovery (L19 < L10)		\$ 68,587		<b>OK</b>
<b>Additives to the Basic MLB Rate</b>					
<b>PRI ISDN</b>			<b>Rate</b>		
L20	PRI ISDN Port Charge		\$ 36.29	\$ 9.61	
<b>Final Basic MLB, PRI ISDN, &amp; Centrex USF Rates Summary</b>					
L21	MLB	L13	\$ 3.98		
L22	PBX	L13	\$ 3.98		
L23	PRI ISDN	L15+L20	\$ 29.51		
L24	Centrex	L14	\$ 0.44		