

2021 Cincinnati Bell Telephone Company
PRICE CAP REVISIONS

2021 Hawaiian Telcom and Cincinnati Bell Telephone Combined
INTERCARRIER COMPENSATION

2021 Cincinnati Bell Telephone Company
Annual Tariff Review Plan Filing

June 16, 2021

Description & Justification

Introduction

A. Background

This filing represents Cincinnati Bell Telephone Company's (CBT's) Annual 2021 Tariff Review Plan (TRP) filing as well as the combined Cincinnati Bell Telephone /Hawaiian Telecom support data and to the filings required by the *USF/ICC Transformation Order*¹ to develop its Access Recovery Charges.

This filing is being made in compliance with the following:

- * Second Report and Order, *In the Matter of Policy and Rules Concerning Rates for Dominant Carriers*, CC Docket No. 87-313, released October 4, 1990 (LEC Price Cap Order);
- * Order on Reconsideration, *In the Matter of Policy and Rules Concerning Rates for Dominant Carriers*, CC Docket No. 87-313, released April 17, 1991 (Recon. Order);
- * First Report and Order, *In the Matter of Price Cap Performance Review for Local Exchange Carriers*, CC Docket No. 94-1, Released April 7, 1995;

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

- * Report and Order, *In the Matter of Price Cap Regulation of Local Exchange Carriers, Rate-of-Return Sharing and Lower Formula Adjustment*, CC Docket No. 93-179, released April 14, 1995;
- * Third Report and Order, *In the Matter of Price Cap Performance Review for Local Exchange Carriers*, CC Docket No. 94-1, FCC 96-488, released December 24, 1996;
- * Report and Order, *In the Matter of Implementation of Section 402(b)(1) (A) of the Telecommunications Act of 1996*, CC Docket No. 96-187, FCC 97-23, released January 31, 1997;
- * First Report and Order, *In the Matter of Access Charge Reform*, CC Docket No. 96-262, FCC 97-158, released May 16, 1997;
- * Fourth Report and Order, *In the Matter of Price Cap Performance Review for Local Exchange Carriers*, CC Docket No. 94-1, FCC 97-159, released May 21, 1997;
- * Memorandum Order and Opinion, *In the Matter of Access Charge Reform*, CC Docket No. 97-250, FCC 98-106, released June 1, 1998;
- * 47 C.F.R. § 61.38 and § 61.41 through § 61.49; and 47 C.F.R., Part 61, generally.

Herein referred to collectively as the "Price Cap Rules".

- * Sixth Report And Order in CC Docket 96-262 And 94-1, Report and Order in CC Docket 99-249, Eleventh Report And Order in CC Docket 96-45.

Herein referred to as the "CALLS Order"

- * Report And Order And Further Notice Of Proposed Rulemaking FCC 11-161, WC Docket 10-90, GN Docket 09-51, WC Docket 07-135, WC Docket 05-337, CC Docket 01-92 CC Docket 96-45 WC Docket 03-109, WT Docket 10-208, released November 18, 2011.

Herein referred to as the "USF/ICC Transformation Order".

Report and Order, *In the Matter of Business Data Services in an Internet Protocol Environment*, WC Docket No. 16-143, *Technology Transitions* GN Docket No. 13-5, *Special Access for Price Cap Local Exchange Carriers* WC Docket No. 05-25, *AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services*, RM-10593, DA 17-43, Released April 28, 2017.

Herein referred to as the "BDS Order".

* Order, *In the Matter of July 1, 2021 Annual Access Charge Tariff Filings* DA 21-433, released April 16, 2021.

In this filing, CBT files its Special Access and Common Line Annual Access Filing. On July 2, 2018, CBT acquired Hawaiian Telcom. Therefore, CBT also provides combined Cincinnati Bell Telephone (CBT)/Hawaiian Telcom support data and to the filings required by the *USF/ICC Transformation Order*² to develop its Access Recovery Charges. Section A addresses CBT's annual access tariff filing, and Section B addresses its filings pursuant to the *USF/ICC Transformation Order*.

The Commission, in its Order (DA 21-433) established an effective date of July 1, 2021 for the USF/ICC Transformation and Special Access Annual Access Filings.

² *Connect America Fund et al.*, WC Docket No. 10-90 et al., Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161, (November 18, 2011).

SECTION A

Special Access and Common Line

1.0 INTRODUCTION

Cincinnati Bell Telephone hereby submits its Tariff Review Plans (TRP) and the necessary support data as required by the Commission and in compliance with Sections 61.41 through 61.49 of the Commission's Rules.

This filing reflects the effects of the exogenous cost adjustments related to Telecommunications Relay Service ("TRS"), Regulatory Fee Obligations, and North American Numbering Plan Administration ("NANPA"). The exogenous cost methodology used in this filing has not changed from that used last year. However, while the methodology continues to reflect the exclusion of advanced services, it also reflects the exclusion of Special Access Services in compliance with the FCC's *Business Data Service Order*³ for those services that are no longer subject to Section 203 of the Communications Act.

2.0 PCI Development

CBT calculated its Price Cap Indices ("PCI") for the Common Line and Special Access baskets in accordance with the CALLS Price Cap Rules. See TRP Form PCI-1.

³ See *Report and Order, Business Data Services in an Internet Protocol Environment; Technology Transitions; Special Access for Price Cap Local Exchange Carriers; AT&T Petition for Rulemaking To Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access*, WC Docket Nos. 16-143, 05-25, GM Docket No. 13-5 and RM-10593; FCC 17-43 (Adopted April 20, 2017, and rel. April 28, 2017) ("BDS Order")

2.1 GDP-PI

In accordance with paragraph 183 of the CALLS Order, the Bureau of Economic Analysis' (BEA's) chain-weighted GDP-PI is being used in this filing. CBT uses a GDP-PI of 1.2389 percent in this TRP filing.

2.2 Productivity Factor

The Commission's CALLS Order changes the Productivity Factor, or X-factor to a transitional mechanism to lower rates for a specified period for special access. Per the BDS Order, and as noted in the Commission's Order, DA 17-1009, the X-factor is set to 2.0 percent minus the inflation rate for the deemed non-competitive services remaining in the Special Access basket.

2.3 Index Changes

As directed by the Commission, a workpaper identifying the transmittal or letter filing date where the last index changes were implemented for the price cap categories has been included. See Exhibit IND-TM.

3.0 Payphone Line Counts

The Commission exempted payphone lines from Presubscribed Interexchange Carrier Charges (PICC) in its Order On Reconsideration, FCC 03-139, released June 25, 2003. Accordingly, CBT has removed its payphone lines from the PICC Multi-line Business line counts. CBT no longer has a PICC charge therefore there is no revenue impact of the payphone line removal.

4.0 Exogenous Costs

In accordance with the Commission's Rules, CBT developed certain exogenous cost changes for inclusion in the price cap formula. These changes include: (1) Regulatory Fees; (2) Telecommunications Relay Support; (3) North American Number Plan Administration.

Exogenous cost changes were individually developed for each of the items outlined above, and in aggregate for all changes. CBT has adjusted the exogenous amounts to reflect any shift in revenue growth. The result is that no exogenous adjustment is made if the support rate has not changed. A brief description follows and a summary of the exogenous changes is shown in exhibit EXG-ALLOCATE.

4.1 Development of Regulatory Fees

On August 31, 2020, the Commission released its Report and Order in the *Matter of Assessment and Collection of Regulatory Fees for Fiscal Year 2020*, FCC 20-120. This Order specified the Regulatory Fee factor of 0.00321. CBT filed a Mid-Year Tariff Review Plan, Transmittal No. 930 to reflect the revised TRS factor. The current 0.00321 factor was multiplied by CBT's end-user revenue from FCC Form 499A to yield CBT's 2021 Regulatory Fees exogenous adjustment. See Exhibit EXG-ALLOCATE.

4.2 Development of Telecom Relay Support (TRS)

On June 28, 2019, the Commission released its Order in the Matter of *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities* DA 19-607.

This Order specified a TRS factor of 0.02779. This factor was multiplied by CBT's end-user interstate revenue from FCC Form 499A to yield CBT's 2020 revised exogenous cost adjustment which was filed in CBT's 2020 Annual Access Filing.

On June 30, 2020, the Commission released its Order in the Matter of *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, DA 20-692. This Order defined and established two TRS factors: Non-IP CTS factor of 0.01360 and IP-CTS factor of 0.00962. The Order also specifies that the Non-IP-CTS factor should be applied to End-User revenues obtained from Interstate and International Telecommunications Services, while the IP-CTS factor should be applied to End-User revenues obtained from Intrastate, Interstate and International Telecommunications Services. CBT filed a Mid-Year Tariff Review Plan, Transmittal No. 930 to reflect the revised TRS factor CBT calculated its 2021 TRS Exogenous adjustment by multiplying each factor to the specified 2020 End-User revenues from FCC Form 499A. See Exhibit EXG-ALLOCATE.

4.3 Development of North American Numbering Plan (NANP) Contribution

On August 10, 2020, the Commission released Public Notice CC Docket 92-237, DA 20-856, *Wireline Competition Bureau Announces The Proposed North American Numbering Plan Administration Fund Size Estimate and Contribution Factor for October 2020 through September 2021*. This Public Notice proposed a NANP factor of 0.0001267. CBT calculated its 2021 Regulatory Fees Exogenous adjustment by multiplying the 0.0001267 factor by the 2020 End-User revenue from FCC Form 499 to yield the 2021 NANP exogenous adjustment. See Exhibit EXG-ALLOCATE.

5.0 Pricing Bands

CBT calculated its applicable upper pricing bands in accordance with the Price Cap Rules. See TRP Form IND-1.

6.0 API and SBI Development

CBT calculated the applicable APIs and SBIs in accordance with the Price Cap Rules. CBT's APIs do not exceed the applicable PCIs and its SBIs are within the applicable upper pricing bands. See TRP Form IND-1.

7.0 Common Line

7.1 CALLS Impact on Common Line Charges

The CALLS Order combines the Carrier Common Line (CCL), End-user Common Line (EUCL - also known as the SLC), and PICC

charges into a single charge for residence and single-line business customers.

7.1.1. End-User Common Line Development

The CALLS Order set the EUCL ceiling for residence and single-line business lines to \$6.50 beginning in July, 2003. However, Price Cap companies are limited to a residence and single-line business EUCL equal to the Common Line, Marketing, and Transport revenue per line, if that revenue per line is less than the \$6.50 ceiling. To compute the EUCL rates, CBT developed line demand and MOU demand quantities based on the year 2020 demand levels. Following the CALLS Order, CBT then calculated its proposed Common Line, Marketing and Transport (CMT) revenue per line. The CMT revenue per line of \$5.68 is less than the \$6.50 residence and single-line business EUCL ceiling.

Therefore, in accordance with Part 69.152(e)(1) and Part 69.152(k)(1) of the Commission's Rules, as well as the change in CBT's USF support, CBT's calculated EUCL rates are \$5.68 for Residence and Single-line business, \$5.68 for Non-primary Residence and ISDN-BRI, and \$5.68 for Multi-line Business, ISDN-PRI and Centrex. See TRP Form CAP-1.

7.1.2. IAS Support.

Pursuant to the 2011 USF/ICC Transformation Order, FCC 11-161 (rel. Nov. 18, 2011); 47 C.F.R. §54.312(a)(3); and DA 13-2101, the Commission eliminated Interstate Access Support (IAS). However, carriers previously receiving frozen support were required to calculate interstate rates as though they were still receiving IAS on a frozen per-line basis. Consistent with section 54.312(a)(3), beginning with CBT's 2020 Annual Access Filing, Transmittal No. 928, per-line IAS support is no longer included in the TRP CAP schedules

8.0 Special Access Basket

The CALLS Order created a Special Access Basket containing Voice Grade, WATS, Metallic, Telegraph, Audio, Video, High Cap, DDS and Wideband services. Per the BDS Order, the X-factor is set to 2.0 percent minus the inflation rate for the deemed non-competitive services remaining in the Special Access basket.

8.1 Competitive Counties

The Commission released its Public Notice, *Wireline Competition Bureau Publicly Releases Lists of Counties Where Lower Speed TDM-Based Business Data Services Are Deemed Competitive, Non-Competitive, or Grandfathered* DA 17-463 on May 15, 2017. The Public Notice contained a link to the Commission's website where the list of competitive and non-competitive counties was available. The Commission's list reflected two counties within CBT's Kentucky territory

that were deemed non-competitive. The remainder of CBT's area was deemed competitive.

8.2 Base Period Demand

CBT's Special Access recurring demand is obtained from CBT's Carrier Access Billing System (CABS). Recurring demand is obtained as a count of in-service quantities.

CBT's two non-competitive counties each have two wire centers fully contained within their respective counties. The wire center boundaries line up exactly with the boundaries of CBT's non-competitive counties. CBT's BDS non-competitive demand is obtained from CBT's Carrier Access Billing System (CABS). The non-competitive recurring demand is obtained as a count of in-service quantities. CBT examined individual circuit types and addresses to verify that the included demand met the BDS non-competitive criteria for inclusion in the non-competitive demand data. CBT does not have wireless backhaul demand with speeds of DS3 or below in its non-competitive counties.

9.0 SBI Limits

As illustrated on TRP Form IND-1, CBT is in compliance with all SBI requirements.

10.0. API and SBI Calculations

The Special Access API is calculated as proposed revenue (base period demand times proposed rates), divided by current revenue (base period demand times current rates), times the existing API per Part 61.46 of the Commission's Rules. See TRP Form IND-1.

SBIs for each Special Access service category are calculated as proposed revenue of each category, divided by current revenue of each category, multiplied by the existing SBI of each service category. Base Period Demand, current rates and proposed rates are displayed on Exhibit RDET.

11.0 Revenue Summary

CBT compared the current and proposed revenues in the Common Line Basket and the Special Access Basket. CBT calculated the difference in total revenues and the percentage difference in revenues for sub-categories in the Common Line Basket and the Special Access Basket. CBT also compared the RDET sub-category totals to Form SUM-1 totals. See TRP Form SUM-1

12.0 Excluded Services

Consistent with the requirements of the Paragraph 31 of the TRP Notice, CBT has provided a list of services that are tarified, but are excluded from Price Caps. See Exhibit OUTPC-1. Also pursuant to paragraph 31, CBT is not listing the services that are not subject to Price cap regulation pursuant to the USF/ICC Transformation Order (BDS ORDER).

13.0 New Services

CBT has included a listing of new services introduced in 2020. See Exhibit CBT-NEW.

14.0 8YY Access Charge Reform Order

In the *8YY Access Charge Reform Order*, price cap incumbent LECs are required to tariff separate rate elements for toll free and non-toll free interstate and intrastate originating end office access service.⁴

CBT's Ohio Intrastate Access Tariff, PUCO No. 1 already mirrors its Federal Tariff, FCC Tariff No. 35. CBT submitted a filing in its Kentucky Intrastate Access Tariff, PSCK No.2 to bring its intrastate Kentucky end office rates into parity with interstate rates. This filing is effective July 1, 2021.

To determine the Kentucky Intrastate Access rate reductions, CBT used the following methodology:

CBT's Kentucky end office rates that are currently higher than its interstate rates shown on the attachment titled 8YY INTRATATE RATE REDUCTION. CBT's Interconnection Minutes of Use (MOU) can be identified as 8YY MOU and MTS (non-8YY) MOU. Interconnection MOU demand amounts are the same as Local Switching MOU demand amounts. CBT applied the Kentucky intrastate 8YY and non-8YY split of Interconnection MOU to the Kentucky intrastate Local Switching MOU to separate Kentucky intrastate Local Switching MOU between 8YY and non-8YY MOUs.

CBT was able to retrieve Kentucky Intrastate MOU data for the period January 2020 to May 2020. To determine the MOUs for the 12-month

⁴ 47 CFR §§ 51.907(i)(1), 51.909(m)(1).

period ending June 30, 2020, CBT totaled the January 2020 through May 2020 MOUs, determined the monthly average for that period and then annualized the monthly average.

CBT used the spreadsheet provided by the Commission to calculate the Kentucky intrastate 8YY revenues based on intrastate rates and interstate rates separately and using 8YY intrastate switched access demand. CBT reduced the Kentucky intrastate rate elements to the level of the interstate rates when the intrastate revenues exceeded the interstate revenues. See attachment 8YY INTRATATE RATE REDUCTION.

CBT in this filing is including rate elements for interstate non-toll free originating transport service between an end office and tandem switch and reducing to zero the rate elements for toll free originating traffic. CBT is filing a single rate element of \$0.001 per minute for joint tandem switched transport access service for 8YY MOU. CBT's Ohio Intrastate Access Tariff, PUCO No. 1 already mirrors its Federal Tariff, FCC Tariff No. 35. CBT submitted a filing in its Kentucky Intrastate Access Tariff, PSCK No.2 to reflect the same changes made in its FCC Tariff No. 35. This filing is effective July 1, 2021.

CBT's 800 Database query rate is currently below the required \$0.004248 per query rate.⁵

⁵ *Id.* §§ 51.907(i)(6), 51.909(m)(6).

SECTION B

2021 Hawaiian Telcom and Cincinnati Bell Telephone Combined INTERCARRIER COMPENSATION

2.0 The Commission requires CBT and Hawaiian Telcom to compute the revenue impact of the access rate and reciprocal compensation reductions to determine the amount of recoverable Eligible Revenue. The Eligible Revenue is distributed between residential, single line business and multi-line business demand to derive the respective Access Recovery Charge (ARC) rates. The resulting ARC rates are validated to ensure compliance with the implementation and ceiling requirements defined in Section 51.915(b)-(e) of the Commission's rules. CBT and Hawaiian Telcom will assess an ARC to their customers as defined and allowed in the USF/ICC Transformation Order. Below is a description of CBT's and Hawaiian Telcom's ARC development. CBT and Hawaiian Telcom will not be participating in the Connect America Fund (CAF) distributions.

2.1 ACCREDITRP Form

The Commission in its Order, *In the Matter of Material to be Filed in Support of 2019 Annual Access Tariff Filing*, DA 19-313 eliminated the Access Reduction spreadsheets because the adjustment to bill-and-keep as required by section 51.907(h) of the Commission's rules is complete.

2.2 RCCMRSTRP Forms

The Commission in its Order, *In the Matter of Material to be Filed in Support of*

2019 Annual Access Tariff Filing, DA 19-313 eliminated the Reciprocal Compensation spreadsheets because the adjustment to bill-and-keep as required by section 51.705(c)(4) of the Commission's rules is complete .

2.3 ELIGIBLE REVENUE (ERTRP) Form

The Eligible Revenue spreadsheet shows the calculations necessary to derive the eligible revenue recoverable through the tariffed ARC rates. The Commission's spreadsheet template provides the methodology for calculating the eligible revenue. This worksheet shows the eligible Access Reduction, net non-CMRS Reciprocal Compensation, and net CMRS Reciprocal Compensation revenue. A Traffic Demand Factor of 34.87% (equal to 90% of last year's 38.74% factor)⁶ and the 90% CALLS Study Area Base Factor⁷ are applied to the above revenues, and the True-Up revenues are added to derive the recoverable eligible revenue. This spreadsheet demonstrates the calculations necessary to determine eligible revenue to comply with section 51.915(e) of the Commission's rules.

2.4 ARC-No CAF- 1TRP ARC-No CAF- 2TRP and ARC-No CAF-32TRP Forms

The ARC No CAF-1 TRP Form displays line count data by exchange within the Ohio, Kentucky and Hawaii study areas. Development of the line count data is discussed below. For 1FR, non-primary lines, ISDN-BRI and single line business, the data sheet lists the applicable basic rates, federal Subscriber Line Charge (SLC), the previous year's ARC rate and state charges

⁶ See 47 C.F.R. §§ 51.915(b)(10).

⁷ See 47 C.F.R. §§ 51.915(b)(2).

including state SLC, zone charges, Telecommunication Relay Service (TRS), E-911, Extended Area Service (EAS), and state Universal Service Fund (USF) charges for each exchange. The ARC No CAF-1 TRP data is combined with eligible revenue recovery data for use in the ARC No CAF-2 TRP form to compute maximum eligible ARC and CAF revenue recovery. CBT and Hawaiian Telcom each assess an ARC to their customers as defined and allowed in the USF/ICC Transformation Order. The ARC No CAF-3TRP Form compares the Eligible Recovery Revenue to the Maximum ARC Revenues. In their 2012 Annual Access/ICC filings, CBT and Hawaiian Telcom stated that they will not be participating in the Connect America Fund (CAF) distributions.

2.5 ARCRCTRP Forms

The ARCRTRP forms show the development of the ARC caps by line type and the tariffed ARC rates by line type. The ARCTRP-No CAF-2 Form distributes actual ARC recovery between residential, non-MLB lines and MLB lines based on the line weighting methodology prescribed in the USF/ICC Transformation Order.

2.5.1 ARCRCTRP-No CAF-1 Form

The ARCRCTRP-No CAF 1 Form contains line count data by exchange within the Ohio and Kentucky and Hawaii study areas. For 1FR, non-primary lines, ISDN-BRI and single line business, the data sheet lists the applicable basic rates, federal Subscriber Line Charge (SLC), prior year ARC and state charges

including state SLC, zone charges, Telecommunication Relay Service (TRS), E-911, Extended Area Service (EAS), and state Universal Service Fund (USF) charges for each exchange. The rates are summed for use in the ARCRCTRTP form for comparison of maximum and tariffed ARC.

2.5.2 ARCRCTRTP-No CAF-2 Form

The ARCTRTP No CAF-2 uses the line count data and rate data from the ARCTRTP-No CAF-1 forms to compute the CBT's maximum ARC revenue recovery opportunity based on the ARC rate ceilings prescribed in the USF/ICC Transformation Order. The form also displays actual ARC revenues eligible for recovery from the ERTRP Form. The data is displayed by study area and also summarized at a total company level. The maximum ARC recovery assumes that the maximum ARC rates are charged for all SLB lines, all MLB lines, and residential lines for exchanges in which the total IFR rates are less than the \$30 per month cap prescribed in the USF/ICC Transformation Order. The form compares ARC actual recovery, based on the tariffed ARC, to the total eligible ARC recovery to ensure that recovered ARC revenues do not exceed eligible ARC revenues.

2.6 LINE COUNT DEVELOPMENT

2.6.1 CBT

CBT analyzed the line count change from total year 2011 to total year 2020 by line type and by End Office (EO). CBT used a straight-line forecast

based on the changes from total year 2011 to total year 2020 by end office and by line-type to forecast line counts for the July, 2021 through June, 2022 period. CBT used December, 2020 annualized line count data by line type, by end office as a beginning point for forecasting lines for the July, 2021 through June, 2022 period.

First, CBT applied one-half the annual forecasted change to the annualized December 2020 lines to account for the January 2021 – June 2021 period. CBT then applied the total year forecasted change to the line counts forecasted as of June 2021 to determine forecasted lines for the July 2021 to June, 2022 period. CBT applied the following equation to the annualized December 2020 lines by line type and EO:

$$\text{December 2020 Annualized lines} + (\text{annual forecasted change} \times .5) + \text{annual forecasted change} = \text{July 2021 through June 2022 Forecasted lines.}$$

The July 2021 to June 2022 forecasted line counts were then summarized by exchange and line type for input into the ARCRCTR – No CAF-1 and ARC No-CAF study area forms.

2.6.2 Hawaiian Telcom

Hawaiian Telcom developed a 12-month annual line count forecast by analyzing the access line count change from total year 2015, total year 2015 to total year 2016, total year 2016 to total year 2017, total year 2017 to total year 2018, total year 2018 to total year 2019 and total year 2019 to total year 2020 by line type, and by central office. Hawaiian Telcom developed a straight-line forecast change rate, by line type, and by central office. A similar analysis was

completed for residential lifeline access lines, by central office. Hawaiian Telcom used the December 2020 annualized line counts, by line type, by central office as the beginning point for developing the line forecast used in this filing. The straight-line change rate was applied to the December 2020 annualized line counts to develop the access line demand counts for the July 2021 through June 2022 period. The resulting forecast lines were reduced by the forecast residential lifeline access lines, by central office.

2.7 ICC-SUM-1 Form

The ICC-SUM-1 form provides a comparison between the 2020 ICC filing and the current 2021 ICC filing by study area for the following recoverable revenues: access reductions, net reciprocal compensation revenues, net CMRS revenues, eligible recovery revenues and maximum ARC revenues. The ICC-SUM-1 form also provides a comparison of eligible ARC lines between the 2020 ICC filing and the current 2021 ICC filing by study area for residence, single line business, and multi-line business. The ICC-SUM-1 form also includes ARC True-up revenues for the year beginning July 1, 2019

2.8 ARC-TUP Form

The Commission's rules in 47 C.F.R 51.915(d)(1)(iv) (F) require that ILECs compute Access Recovery Charges less Expected Revenues for Access Recovery Charges for the year beginning July 1, 2019 (True-up amount). The ARC-TUP form shows the calculation of the difference in Expected ARC Revenues and Actual ARC revenues for the year beginning July 1, 2019. Actual

line counts for the period are multiplied by the ARC rate for that period by exchange and by line type (RES/Non-Primary Residential/BRI, Single Line Business, and Multiline Business). These revenues are compared to the Expected ARC Revenues for the period based on the same exchanges and line types. The difference in this calculation is the True-up amount that is included on the ERTRP (eligible Recovery) Form as part of the current year Eligible Recovery calculation.

2.9 Attachments

CBTCAR_21_Confidential	ARC-1 TRP and ARC-2 TRP Forms
CBTCAR_21_Public Redacted	ARC-1 TRP and ARC-2 TRP Forms
CBTCER_21	ERTRP Form
CBTCSUM_21_Confidential	ICC-SUM-1 form
CBTCSUM_21_Public Redacted	ICC-SUM-1 form
CBTCTRC_21_Confidential	ARCRCTRP Forms
CBTCTRC_21_Public Redacted	ARCRCTRP Forms
CBTCTU_21_Confidential	ARC-TUP Form
CBTCTU_21_Public Redacted	ARC-TUP Form

Universal Service Fund

CBT proposes to revise the Universal Service Fund (USF) factor per Commission Order.⁸ The Commission released its *Proposed Third Quarter 2021 Universal Service Contribution Factor*, DA 21-676 on June 10, 2021. The Commission proposed a USF factor of 31.8 %, down from the previous factor of 33.4%. CBT recovers its USF contribution, pursuant to the Commission's Contribution Methodology Order⁸ by applying the relevant USF Contribution factor to the following charges:

- * EUCL
- * Presubscribed Interexchange Carrier (PIC) change charge
- * End-User Special Access
- * Interstate IntraLATA Toll usage

The USF surcharge for these services is reflected as a separate line item, clearly identified on the customer's bill.

⁸ *Report and Order and Second Further Notice of Proposed Rulemaking in CC Docket No. 96-45, CC Docket No. 98-171, CC Docket No. 90-571, CC Docket No. 92-237, CC Docket No. 99-200, CC Docket No. 95-116, and CC Docket No. 98-179, FCC 02-329*, Released December 13, 2002.

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Price Cap Tariff Review Plan

IND-TM

	EXISTING PCI (E)	EXISTING API (F)	EXISTING SBI (G)	6/30/21 PCI (I)	6/30/21 SBI (J)
Special Access Basket					
720 VG/WATS, Met, Tgh - Special	N/A	N/A	930	N/A	930
721 VG Spec Density Zone 1	N/A	N/A	0	N/A	0
722 VG Spec Density Zone 2	N/A	N/A	0	N/A	0
723 VG Spec Density Zone 3	N/A	N/A	0	N/A	0
724 VG Spec Density Zone 4	N/A	N/A	0	N/A	0
725 VG Spec Density Zone 5	N/A	N/A	0	N/A	0
726 VG Spec Density Zone 6	N/A	N/A	0	N/A	0
727 VG Spec Density Zone 7	N/A	N/A	0	N/A	0
730 Audio & Video	N/A	N/A	930	N/A	930
731 Audio/Video Density Zone 1	N/A	N/A	0	N/A	0
732 Audio/Video Density Zone 2	N/A	N/A	0	N/A	0
733 Audio/Video Density Zone 3	N/A	N/A	0	N/A	0
734 Audio/Video Density Zone 4	N/A	N/A	0	N/A	0
735 Audio/Video Density Zone 5	N/A	N/A	0	N/A	0
736 Audio/Video Density Zone 6	N/A	N/A	0	N/A	0
737 Audio/Video Density Zone 7	N/A	N/A	0	N/A	0
740 High Cap & DDS - Special	N/A	N/A	930	N/A	930
750 DS-1 SubCat - Special	N/A	N/A	930	N/A	930
751 DS1 Spec Density Zone 1	N/A	N/A	0	N/A	0
752 DS1 Spec Density Zone 2	N/A	N/A	0	N/A	0
753 DS1 Spec Density Zone 3	N/A	N/A	0	N/A	0
754 DS1 Spec Density Zone 4	N/A	N/A	0	N/A	0
755 DS1 Spec Density Zone 5	N/A	N/A	0	N/A	0
756 DS1 Spec Density Zone 6	N/A	N/A	0	N/A	0
757 DS1 Spec Density Zone 7	N/A	N/A	0	N/A	0
760 DS-3 SubCat - Special	N/A	N/A	930	N/A	930
761 DS3 Spec Density Zone 1	N/A	N/A	0	N/A	0
762 DS3 Spec Density Zone 2	N/A	N/A	0	N/A	0
763 DS3 Spec Density Zone 3	N/A	N/A	0	N/A	0
764 DS3 Spec Density Zone 4	N/A	N/A	0	N/A	0
765 DS3 Spec Density Zone 5	N/A	N/A	0	N/A	0
766 DS3 Spec Density Zone 6	N/A	N/A	0	N/A	0
767 DS3 Spec Density Zone 7	N/A	N/A	0	N/A	0

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Filing Entity: CBTC - Cincinnati Bell Total
Transmittal Number: 933
June 16, 2021 Annual Access TRP Filing
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Price Cap Tariff Review Plan

IND-TM

	EXISTING PCI (E)	EXISTING API (F)	EXISTING SBI (G)	6/30/21 PCI (I)	6/30/21 SBI (J)
770 DDS&Other Sp Density Zone 1	N/A	N/A	0	N/A	0
771 DDS&Other Sp Density Zone 2	N/A	N/A	0	N/A	0
772 DDS&Other Sp Density Zone 3	N/A	N/A	0	N/A	0
773 DDS&Other Sp Density Zone 4	N/A	N/A	0	N/A	0
774 DDS&Other Sp Density Zone 5	N/A	N/A	0	N/A	0
775 DDS&Other Sp Density Zone 6	N/A	N/A	0	N/A	0
776 DDS&Other Sp Density Zone 7	N/A	N/A	0	N/A	0
790 Wideband	N/A	N/A	0	N/A	0
791 WB Density Zone 1	N/A	N/A	0	N/A	0
792 WB Density Zone 2	N/A	N/A	0	N/A	0
793 WB Density Zone 3	N/A	N/A	0	N/A	0
794 WB Density Zone 4	N/A	N/A	0	N/A	0
795 WB Density Zone 5	N/A	N/A	0	N/A	0
796 WB Density Zone 6	N/A	N/A	0	N/A	0
797 WB Density Zone 7	N/A	N/A	0	N/A	0
899 Total Special Access	930	930	N/A	930	N/A

Filing Date:
Filing Entity:
Transmittal Number:

06/16/2021
CBTC - Cincinnati Bell Total
933

EXG-ALLOCATE

06/16/2021 Price Cap Annual Filing
Exogenous Cost Changes Detail For EXG-1 and CAP Forms

	2019		FCC DA 20-120		FCC DA 19-607		Not Applicable		DA 20-856	
	Total	Interstate	8/31/2020		6/28/2019		Not Applicable		8/10/2020	
	End User Revenues		Regulatory Fee		Telecom Relay		TRS- Non-IPCTS & IPCTS		NANPA	
	(499A)	(499A)	0.00321		0.02779		0		0.0001267	
	(A)	(B)	(C) = B * 0.00321		(D) = B * 0.02779		(D2) = A * 0		(E) = A * 0.0001267	
Exogenous Amount	\$ 159,170,458	\$ 42,060,590	\$ 135,014	\$	1,168,864	\$	-	\$	20,167	
Excluded Revenue	\$ 19,273,642	\$ 19,273,642								
Price Cap Revenue Percentage	87.89%	54.18%								

2019 Mid-Year Rate Changes		FCC DA 20-120		FCC DA 20-692		FCC DA 20-692		DA 20-856	
Mid-Year Filing Date		8/31/2020		6/30/2020		6/30/2020		8/10/2020	
		0.00321		0.0136		0.00962		0.0001267	
		(C') = B * 0.00321		(D') = B * 0.0136		(D2') = A * 0.00962		(E') = A * 0.0001267	
Exogenous Amount		\$ 135,014	\$	572,024	\$	1,531,220	\$	20,167	
Difference		(F) = (C) - (C')		(G) = (D') - (D)		(G2) = (D2') - (D2)		(H) = (E) - (E')	
		\$ -	\$	(596,840)	\$	1,531,220	\$	-	
Annualization Reversal Factor associated with each exogenous cost									
		1.333333		1.333333		1.333333		1.333333	
Annualized Reversal		(I) = (F) * 1 1/3		(J) = (G) * 1 1/3		(J2) = (G2) * 1 1/3		(K) = (H) * 1 1/3	
		\$ -	\$	(795,786)	\$	2,041,626	\$	-	

2020 Annual		FCC DA 20-120		FCC DA 20-692		FCC DA 20-692		DA 20-856	
Total		8/31/2020		6/30/2020		6/30/2020		8/10/2020	
End User Revenues		Regulatory Fee		TRS--Non-IPCTS		TRS--IPCTS		NANPA	
		0.00321		0.0136		0.00962		0.0001267	
		(C) = B * 0.00321		(D) = B * 0.0136		(D2) = A * 0.00962		(E) = A * 0.0001267	
Exogenous Amount	\$ 148,179,937	\$ 42,943,159	\$ 137,848	\$ 584,027	\$	1,425,491	\$	18,774	
Excluded Revenue	\$ 21,345,763	\$ 21,345,763							
Price Cap Revenue Percentage	85.59%	50.29%							

<u>Regulatory Fee Support:</u>	<u>10/2020 - 9/2021</u>	<u>10/2021 - 9/2022</u>	<u>Exogenous</u>
	(A)	(B)	(C) = B - A
FCC DA 20-120 - 0.00321 Factor 2019 Revenue - C	\$ 135,014		
	\$ -		
FCC DA 20-120 - 0.00321 Factor 2020 Annual Revenue - C		\$ 137,848	
	\$ 135,014	\$ 137,848	
% Price Cap Allocation	54.18%	50.29%	
Price Cap Exogenous Amount	\$ 73,146	\$ 69,328	
FCC 2019 Price Cap Interstate End User Revenue	\$ 22,786,948		
FCC 2021 Price Cap Interstate End User Revenue	\$ 21,597,396		
Revenue Change (R)	-5.22%		
Price Cap Only with R Adj	\$ 69,328	\$ 69,328	0

<u>Telecom Relay Support</u>	<u>7/2020 - 6/2021</u>	<u>7/2021 - 6/2022</u>	<u>Exogenous</u>
	(A)	(B)	(C) = B - A
FCC DA 19-607 - 0.02779 Factor 2019 Revenue - D	\$ 1,168,864		
Not Applicable - 0 Factor 2019 Revenue - D2	\$ -		
FCC DA 20-692 - 0.0136 Factor 2019 Mid-Year Revenue - J	\$ (795,786)		
FCC DA 20-692 - 0.00962 Factor 2019 Mid-Year Revenue - J2	\$ 2,041,626		
FCC DA 20-692 - 0.0136 Factor 2020 Annual Revenue - D		\$ 584,027	
FCC DA 20-692 - 0.00962 Factor 2020 Annual Revenue - D2		\$ 1,425,491	
	\$ 2,414,704	\$ 2,009,518	

% Price Cap Allocation	54.18%		
% Price Cap Allocation - Non-IPCTS		50.29%	
Price Cap Allocation - Non-IPCTS	\$ 202,120	\$ 293,725	
% Price Cap Allocation - IPCTS	87.89%	85.59%	
Price Cap Allocation - IPCTS	\$ 1,794,410	\$ 1,220,145	
Price Cap Exogenous Amount	\$ 1,996,530	\$ 1,513,869	
FCC 2019 Price Cap Interstate End User Revenue	\$ 22,786,948		
FCC 2021 Price Cap Interstate End User Revenue	\$ 21,597,396		
Revenue Change (R)	-5.22%		
Price Cap Only with R Adj	\$ 1,892,305	\$ 1,513,869	(378,435)

<u>North American Numbering Plan Administration:</u>	<u>10/2020 - 9/2021</u>	<u>10/2021 - 9/2022</u>	<u>Exogenous</u>
	(A)	(B)	(C) = B - A
DA 20-856 - 0.0001267 Factor 2019 Revenue - E	\$ 20,167		
	\$ -		
DA 20-856 - 0.0001267 Factor 2020 Annual Revenue - E		\$ 18,774	
	\$ 20,167	\$ 18,774	
% Price Cap Allocation	87.89%	85.59%	
Price Cap Exogenous Amount	\$ 17,725	\$ 16,070	
FCC 2019 Price Cap Total End User Revenue	\$ 139,896,816		
FCC 2021 Price Cap Total End User Revenue	\$ 126,834,174		
Revenue Change (R)	-9.34%		
Price Cap Only with R Adj	\$ 16,070	\$ 16,070	0

	Common Line	Special	Price Cap Revenue
499A 2021 Interstate End User Revenues	\$ 21,576,431.97	\$ 20,964.34	\$ 21,597,396.30
Allocation Basis	99.90%	0.10%	
Regulatory Fee Support:	\$ -	\$ -	0
Telecom. Relay Support	\$ (378,068)	\$ (367)	(378,435)
NANPA	\$ -	\$ -	-
Total Exogenous	\$ (378,068)	\$ (367)	(378,435)
Allocation - See Attached Forms	\$ -	\$ -	-
ITC Amortization	\$ -	\$ -	-
Excess Deferred Taxes	\$ -	\$ -	-
Sub Total	0	0	
Grand Total Exogenous	\$ (378,068)	\$ (367)	(378,435)

IMP-ANALYSIS

Filing Entity: CBTC - Cincinnati Bell Total
Filing Date: 06/16/2021
Transmittal No.: 933

TRP

June 16, 2021 Annual Price Cap Access Filing (CBTCANN20.XLS)
IMPACT ANALYSIS FOR INDUSTRY

Basket Description					SUM-1	SUM-1			
					BASE PERIOD		BASE PERIOD		
	Demand Times		Demand Times		DEMAND x		DEMAND x		
	Current Rate	Proposed Rate	Difference	% Difference	RATES AT LAST	Difference	PROPOSED RATES	Difference	
	(A)	(B)	(C) = (B) - (A)	(D) = (C)/(A)	PCI UPDATE	(B1) = A - A1	(C1)	(D1) = B - C1	
					(A1)				
Common Line Basket									
End User Common Line	\$17,978,881	\$17,600,813	(\$378,068)	-2.10%	\$17,978,881	\$0	\$17,600,813	\$0	
Common Line per MOU	\$0	\$0	\$0	0.00%	\$0	\$0	\$0	\$0	
PICC Common Line	\$0	\$0	\$0	0.00%	\$0	\$0	\$0	\$0	
Other Common Line	\$0	\$0	\$0	0.00%		\$0		\$0	
USAC IAS Support	\$0	\$0	\$0	0.00%	\$0	\$0	\$0	\$0	
Total Common Line	\$17,978,881	\$17,600,813	(\$378,068)	-2.10%	\$17,978,881	\$0	\$17,600,813	\$0	
Special Access Basket									
VoiceGrade/WATS - NonDZ	\$0	\$0	\$0	0.00%	\$0	\$0	\$0	\$0	
Audio & Video - NonDZ	\$0	\$0	\$0	0.00%	\$0	\$0	\$0	\$0	
Total High Cap/DDS	\$3,333	\$2,966	(\$367)	-11.02%	\$3,333	\$0	\$2,966	\$0	
Total High Cap - DS1 - Special	\$3,333	\$2,966	(\$367)	-11.02%					
High Cap - DS1 - SP - DZ1	\$0	\$0	\$0	0.00%					
High Cap - DS1 - SP - DZ2	\$0	\$0	\$0	0.00%					
High Cap - DS1 - SP - DZ3	\$0	\$0	\$0	0.00%					
High Cap - DS1 - SP - NonDZ	\$3,333	\$2,966	(\$367)	-11.02%					
Total High Cap - DS3 - Special	\$0	\$0	\$0	0.00%					
High Cap - DS3 - SP - DZ1	\$0	\$0	\$0	0.00%					
High Cap - DS3 - SP - DZ2	\$0	\$0	\$0	0.00%					
High Cap - DS3 - SP - DZ3	\$0	\$0	\$0	0.00%					
High Cap - DS3 - SP - Non DZ	\$0	\$0	\$0	0.00%					
High Cap - Digital Data NonDZ	\$0	\$0	\$0	0.00%					
Total Special Access Basket	\$3,333	\$2,966	(\$367)	-11.02%	\$3,333	\$0	\$2,966	\$0	
Grand Total (Common Line & Special)	\$17,982,214	\$17,603,779	(\$378,435)	-2.10%	\$17,982,214	\$0	\$17,603,779	\$0	

SERVICES OUTSIDE OF PRICE CAP

<u>Rate Element Detail</u>	<u>Tariff Section</u>
Special Construction	
Special Construction	FCC #35 7.2
Collocation/Interconnection	
Physical Collocation	FCC #35 17.10.2
Virtual Collocation	FCC #35 17.11.1
Packet Services	
Ethernet Service	FCC #35 19.6
Ethernet Point-to-Point Service	FCC #35 24.4
Cincinnati Bell Ethernet Service Silver	FCC #35 26.7
End User Services	
End User USF End User Charge	FCC #35 4.10
Government Services	
Special Government Access Services –TSP & GETS	FCC #35 10.8.2
Miscellaneous	
Special Facilities Routing of Access Services	FCC #35 11.2

CBT-NEW

2021 New Services

CBT introduced the following new services in 2020:

<u>New Service</u>	<u>Transmittal</u>	<u>Basket</u>	<u>Category</u>
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NONE

	A	B	C	D	E	F	G	H	I	J	K	L	M	N
6	8YY INTRASTATE RATE REDUCTION													
7	TY 2021-2022 Intrastate Toll Free Originating End Office Access Service Rate Calculations													
8	Intrastate Tariff Section	Interstate Tariff Section	USOC	Intrastate and Interstate Toll Free Usage-Based Originating End Office Access Service Rate Elements	Unit of Demand (e.g., MOU)	6/30/2020 Intrastate Toll Free Rate	6/30/2020 Interstate Toll Free Rate	7/1/2019 - 6/30/2020 Intrastate Toll Free Originating Units	Price-Out with 6/30/2020 Toll Free Rates and 7/1/2019 - 6/30/2020 Units	Price-Out with 6/30/2020 Toll Free Rates and 7/1/2019 - 6/30/2020 Units	Price-Out Difference	7/1/2021 Proposed Intrastate Toll Free Rate		
9	Input	Input	Input	Input (Note 1)	Input	Input	Input	Input	F*H	G*H	(I-J)	Input (Note 2)		
10	** TOLL FREE ORIGINATING END OFFICE ACCESS SERVICE **													
11	Originating Carrier Common Line													
12														
13	Interconnection Charge													
14														
15	6.8.1	6.8.1		Originating non-transport provided access PREMIUM KENTUCKY	MOU	0.0005916	0.0000000	642,780	380	0	380	0.0000000		
16	6.8.1	6.8.1		Originating non-transport-provided access TRANSITIONAL KENTUCKY	MOU	0.0002958	0.0000000	0	0	0	0	0.0000000		
17														
18														
19	Originating Local Switching													
20														
21	6.8.3	6.8.3(A)(1)(A)		LOCAL SWITCHING(LS1) PREM ORIGINATING KENTUCKY	MOU	\$0.005404	0.0038625	642,780	3,474	2,483	991	0.0038625		
22														
23	6.8.3	6.8.3(A)(1)(A)		LOCAL SWITCHING(LS2) PREM ORIGINATING KENTUCKY	MOU	\$0.005404	0.0038625	0	0	0	0	0.0038625		
24														
25	6.8.3(A)(1)(A)	6.8.3(A)(1)(B)		COMMON TRUNK PORT ORIGINATING KENTUCKY	MOU	\$0.000978	0.000968	91,454	89	88.53	1	0.000968		
26														
27														
28														
29														
30														
31														
32														
33														
34														
35														
36														
37														
38														
39														
40														
41														
42														
43														
44														
45														
46														
47														
48	Total									3,943	2,571	1,372		
49														
50	Note 1: Enter one rate element per line under the relevant category. Insert rows as necessary.													
51														