



60 Columbia Road
Building A – 2nd Floor
Morristown, NJ 07960

Susan Boylan
Senior Director
Access Tariff Cost Development
PH 973-884-8186
FX 973-599-6612
sboyland@neca.org

March 15, 2024

Transmittal No. 1694 - Amended

Secretary
Federal Communications Commission
Washington, D.C. 20554

Attention: Wireline Competition Bureau

The accompanying tariff material, issued on behalf of the National Exchange Carrier Association, Inc. (NECA) bearing Tariff F.C.C. No. 5, Access Service, is sent to you for filing, in compliance with the Communications Act of 1934, as amended.

With this filing NECA is amending Transmittal No. 1694 to submit updated Tariff Review Plan (TRP) Connect America Fund Broadband Loop Support (CAF BLS) and Connect America Fund Inter-carrier Compensation (CAF ICC) spreadsheet files, as described below.

Transmittal No. 1694 was originally filed on June 16, 2023 and became effective July 1, 2023 and was amended July 17, 2023, July 31, 2023, August 17, 2023, September 18, 2023, October 17, 2023, November 16, 2023, December 15, 2023, December 18, 2023 and January 17, 2024. As part of the cost support for Transmittal No. 1694, NECA submitted the required TRP CAF ICC and TRP CAF BLS spreadsheet files for the 2023-2024 tariff test period.

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

Table 1

<u>Company Name</u>	<u>State</u>	<u>Study Area</u>
Siskiyou Tel. Co.	CA	542339
Skyline Telecom Company	WA	520581

Coincident with this amendment, NECA is filing tariff revisions today under Transmittal No. 1715 to modify CBOL.

Revised company certifications are included in Appendix D, Exhibit 4 Accuracy of CAF BLS Data. No changes were made to other companies' certifications previously submitted in Appendix D Exhibits.

Finally, this amendment resubmits the TRPText.pdf and TRP_Exhibits.xlsx files originally filed on June 16, 2023 amended on July 17, 2023, July 31, 2023, August 17, 2023, September 18, 2023, October 17, 2023, November 16, 2023, December 15, 2023, December 18, 2023 and January 17, 2024. No changes were made to the originally transmitted files other than to reflect today's resubmission.

As was the case with the confidential TRP CAF ICC and TRP CAF BLS files originally transmitted on June 16, 2023 under Transmittal No. 1694, NECA seeks confidential treatment of this data pursuant to the 2023 *Protective Order* designated for use in the 2023 Annual Access Charge Tariff Filings proceeding.¹

Accordingly, the confidential files have been marked, "**CONTAINS PRIVILEGED AND CONFIDENTIAL INFORMATION – DO NOT RELEASE (PER DA 23-470 PROTECTIVE ORDER)**." Attachment A of this Transmittal Letter contains detailed information regarding NECA's request for confidential treatment. This filing also includes a redacted version of the file identified in Attachment A marked, "**REDACTED – FOR PUBLIC INSPECTION.**"

Attachment B to this transmittal includes the listing of FCC Registration Numbers (FRNs) for the Telephone Companies on whose behalf this tariff filing is being made.

In compliance with Section 61.14 of the Commission's Rules, the amended transmittal and associated files are being transmitted electronically today via the Commission's Electronic Tariff Filing System.

All correspondence and inquiries concerning this filing should be directed to me at the above address or faxed to 973-599-6612.



Attachments

TRPText.pdf
TRP_Exhibits.xlsx
TRPCAFICC_Public.xlsx
TRPCAFICC_Confidential.xlsx
TRPCAFBLS_Public.xlsx
TRPCAFBLS_Confidential.xlsx
Vol1ExhibitsD.pdf

¹ See *Procedures for Obtaining Confidential Information from 2023 Annual Access Charge Tariff Filings*, Public Notice, WC Docket No. 23-9, DA 23-470 (rel. June 1, 2023) (2023 *Protective Order*).

Request for Confidential Treatment

NECA seeks confidential treatment under the *2023 Protective Order* designated for use in this proceeding¹ for the data provided in the TRP files identified below. This data is filed electronically via ETFS as part of the Tariff Review Plan for NECA's Tariff F.C.C. No. 5 Annual Tariff filing, made under Transmittal No. 1694. This data is required by the Commission to monitor rate of return exchange carrier compliance² with rules regarding the revenue recovery mechanism³ for revenue lost due to mandatory access rate reductions and with the Commission's universal service mechanisms reforms for rate of return carriers.⁴

Pursuant to the terms of the *2023 Protective Order*, signed declarations requesting access to the confidential information should be sent to the attention of Susan Boylan, NECA Senior Director Access Tariff Cost Development, via email to Tariff5@neca.org or via facsimile at 973.599.6612. NECA will provide an electronic copy of the nonredacted files to Authorized Representative(s).⁵ NECA designates 60 Columbia Road, Building A – 2nd Floor, Morristown, NJ 07960 and 1325 G Street, NW, Suite 500, Washington, DC 20005 as its public inspection locations.

Notwithstanding the *2023 Protective Order*, the information provided in the TRP files listed below is entitled to confidential, non-public treatment under the Freedom of Information Act (FOIA) and related provisions of the Commission's rules.⁶ The information satisfies the requirement of FOIA Exemption 4 (trade secrets or commercial/financial information).

NECA submits the following information pursuant to section 0.459 in support of its request for confidential treatment of the data in the identified TRP files.

- Identification of the specific information for which confidential treatment is sought:

NECA seeks confidential treatment for certain information in the following TRP files, which contain confidential and proprietary financial information of NECA Common Line (CL) and Traffic Sensitive (TS) pool participants:

TRPCAFICC_Confidential.xlsx
TRPCAFBLS_Confidential.xlsx

This information includes actual revenues, revenue requirement data and demand for the 2011 fiscal year; trued-up revenues and cost data for the 2021/2022 test period; projections of revenues, cost data and demand for the 2021/2022, 2022/2023 and 2023/2024 test periods; and the product of calculations made using the confidential data.

¹ See *2023 Protective Order*.

² 47 U.S.C § 51.919(b)

³ 47 U.S.C § 51.917

⁴ 47 U.S.C § 54.901

⁵ See *2023 Protective Order*, ¶ 2.a.

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

The data includes information on interstate access, intrastate access, reciprocal compensation, and fees quantified at the study area and/or exchange area level that was used by NECA to calculate each exchange carrier's Eligible Recovery and the ARC rates contained in this proposed tariff filing.

The data also includes information on projected Consumer Broadband-Only Loops, ARC revenues, subscriber line charges (SLC) revenues, Special Access Revenue Requirements, shifted costs, and CAF BLS Broadband-Only support for the 2023/2024 test period.

- Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission:

This information is filed electronically via ETFS in conjunction with NECA Tariff F.C.C. No. 5 Annual Access Charge Filing, Transmittal No. 1694 in WC Docket No. 23-9.

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

The information in the TRP files contains sensitive study area-specific and exchange area-specific information for NECA CL and TS pool participants as required by Commission rules for monitoring compliance with the CAF ICC and CAF BLS recovery mechanisms. At the study area and exchange level, the information is granular and highly confidential to the reporting Tariff No. 5 participants. The financial data is treated as a confidential trade secret by CL and TS pool participants.

- Explanation of the degree to which the information concerns a service that is subject to competition:

Rural telephone service has historically lent itself to "cherry picking" by competitors that choose to serve only the low-cost areas within a study area. Detailed information about revenues, expenses, and demand may help prospective competitors to gain insight into the participating Telephone Companies' market strategies and gain a competitive advantage.

- Identification of any measures taken by the submitting party to prevent unauthorized disclosure:

The information provided in the files is maintained on a confidential basis and made available only to NECA representatives on a need-to-know basis. Any public information is only made available on an aggregate basis.

- Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties:

The information in the identified TRP files is not publicly available.

- Justification of the period during which the submitting party asserts that material should not be available for public disclosure:

NECA requests that all CL and TS pool participant data provided in the TRP files identified above be treated as confidential indefinitely. Because of the sensitive nature of the data, it would not be appropriate for public disclosure at any time in the foreseeable future.

The *2023 Protective Order* places additional requirements on Authorized Representative(s) to destroy or return all confidential information, as well as copies and derivative materials, within two weeks after final resolution of this proceeding.⁷

- Any other information that the party seeking confidential treatment believes may be useful in assessing whether its request for confidentiality should be granted:

NECA is submitting this information on behalf of the ILECs that participate in NECA's CL and/or TS pool. The Commission should take care not to deprive those ILECs of the opportunity to speak for themselves in the event of a FOIA request for access to data. NECA requests that the Commission notify carriers of any FOIA request and allow them to be given a reasonable opportunity to file detailed information supporting continued confidential treatment of their respective data.

Accordingly, NECA requests confidential treatment of the member data provided in the files identified above pursuant to section 0.457 and 0.459 of the Commission's rules and paragraph 1 of the *2023 Protective Order*. Pursuant to the *2023 Protective Order*, NECA has marked each page of the nonredacted version of the identified TRP files as follows:

CONTAINS PRIVILEGED AND CONFIDENTIAL INFORMATION – DO NOT RELEASE (PER DA 23-470 PROTECTIVE ORDER)

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

⁷ See *2023 Protective Order*, ¶ 18.

FCC Registration Number for Tariff 5 Participants

0005097167	0004379749	0001951144	0004925129
0004930350	0003222213	0024813461	0001792696
0017809351	0005067186	0001961416	0004331047
0004321618	0003193000	0027980184	0001792621
0005097134	0023204142	0003745734	0001715937
0004338026	0004976494	0001913979	0004341855
0005078258	0004325924	0001951284	0001714245
0025093154	0005063045	0001952605	0003731114
0004963419	0004379707	0024813446	0001714146
0004384111	0002031698	0024813412	0001714567
0004356952	0004942819	0001952555	0001714708
0004374153	0004381422	0001960962	0004274007
0004956652	0002073138	0001952605	0004964227
0003646213	0004335873	0001912138	0001742170
0004379715	0002071579	0003718426	0004273751
0004491544	0002061653	0005058151	0004929717
0003749819	0027738798	0001887728	0004980421
0003779675	0002069862	0003707775	0001772888
0004331682	0003775244	0001887025	0001773464
0005050083	0002072668	0001889617	0004560645
0004374187	0004960332	0001886704	0005872015
0003772753	0004379731	0001886944	0001773225
0003451317	0004337002	0001889245	0004926796
0003414224	0002008043	0003707874	0004309548
0004314605	0004311528	0003767449	0004260436
0004324570	0002009405	0001886860	0001773670
0004068474	0001824606	0001887140	0005069299
0003436367	0001824606	0003717709	0001792621
0003433323	0003731734	0003707791	0004329330
0003454410	0003757432	0001888718	0004328654
0003435633	0001824606	0001886464	0004319737
0004314480	0004334934	0004317368	0005053251
0004337218	0004361556	0001754738	0004338851
0004315362	0004950937	0004970067	0002926582
0004313953	0001855337	0004561429	0003007481
0004314050	0001856400	0001753938	0004324828
0003412871	0001858760	0005082060	0004332102
0022150361	0003710100	0003767472	0005081542
0022150361	0001856566	0001753870	0004329223
0003774965	0003715885	0004928255	0003739075
0003735867	0001856673	0003731940	0004341798
0003194776	0004306825	0004933032	0003734720
0004966149	0001833193	0004995429	0005051560
0004334686	0003731817	0004261061	0004381281
0004367678	0001856236	0003739380	0005066063
0004379723	0001855287	0001791995	0005063458
0004112835	0004339404	0004246898	0004328688
0004324802	0004333043	0001792787	0004324620

FCC Registration Number for Tariff 5 Participants

0002946879	0002898856	0004339453	0003745825
0002922201	0004330007	0003764735	0003773504
0005062955	0003767613	0003720984	0002591774
0003745700	0002898724	0003795697	0002598464
0005075643	0002901833	0006063770	0002598407
0002924777	0002901817	0004319117	0004330908
0002924751	0002901791	0002817823	0004330965
0002924629	0003936994	0003723525	0002588606
0004984670	0004382545	0003723467	0003722121
0004333266	0004985065	0003747672	0003733029
0015034358	0002723773	0003720968	0003772787
0004156139	0002723732	0004332128	0002598209
0002771228	0002723534	0005077342	0002592285
0005068341	0004380986	0005053632	0003731759
0004342895	0003773454	0003710597	0007299936
0005067228	0002723336	0004323499	0002593358
0004382602	0003773520	0003742954	0002588192
0002771244	0002713683	0003734803	0002592517
0005093224	0003777885	0003721008	0003722188
0005061387	0003749264	0003708203	0003745957
0002756187	0004381711	0003733284	0004776464
0003708104	0003773579	0004980611	0025493925
0004334629	0003773629	0003723699	0002595452
0002776599	0004380952	0004329785	0003749215
0005067509	0003773702	0002817500	0002557627
0004334611	0002721629	0003721495	0003742038
0004342473	0003773785	0003741733	0003722840
0005061627	0002721157	0004301370	0003726759
0004981114	0003740701	0004301339	0002591063
0004927802	0003744398	0002818177	0003755642
0004957528	0002719474	0003726890	0004776464
0004969093	0003774023	0002816411	0003748068
0005067665	0003774072	0005067152	0002596377
0021672852	0003741782	0002819191	0003722790
0004330205	0003749736	0003795754	0002596344
0004329538	0003744125	0003762796	0003726288
0004970711	0004322178	0003740446	0003722113
0003730850	0003774296	0004976932	0003781556
0004328704	0003774320	0004327201	0003722824
0004322269	0004975199	0003772993	0002596195
0002899060	0002720977	0003717949	0007183619
0002900819	0003774338	0011574746	0002595874
0002903045	0003774430	0002587491	0003730959
0004380945	0002717031	0003767969	0003748084
0004382610	0002713626	0004056248	0003776069
0002902955	0002722049	0003722949	0002595734
0003708120	0003774494	0003732633	0002587707
0003739208	0003744141	0002589281	0003748167

FCC Registration Number for Tariff 5 Participants

0004333050	0002593440	0003741576	0002388684
0003722477	0003749512	0002652519	0003707932
0003748183	0004194270	0004320164	0002388247
0002598225	0002598076	0003744224	0004961231
0004322335	0002587863	0003741576	0002387868
0002591154	0003749140	0003742475	0002393411
0013786439	0003749561	0003745940	0003745791
0002595106	0003741642	0003773777	0002393379
0004193983	0002588333	0002652048	0003738283
0002589604	0002592921	0004311304	0002388262
0002594976	0002592897	0003741535	0003707767
0003773827	0003757788	0002639870	0004334918
0002594893	0003724705	0003741436	0004329348
0003748282	0003722758	0003759859	0004262853
0004776464	0003749587	0003773975	0003715877
0002594752	0002592665	0003773991	0003743358
0003724630	0002592640	0004327961	0004961272
0004331062	0003758109	0003741493	0002392249
0003748340	0002557742	0002647857	0004314100
0003734951	0002586998	0003774056	0002387033
0005049895	0002589307	0003739430	0003737194
0002592061	0002592426	0002650828	0002388882
0002588051	0002592392	0002650422	0014015978
0003748258	0002592384	0002644953	0004330890
0002594216	0002590073	0020199584	0003738309
0002594190	0003767969	0003727575	0005084058
0003730702	0003722907	0003759859	0006764948
0002595858	0002590032	0004329629	0005017439
0002576452	0003724655	0002648285	0004331070
0003722998	0003767894	0003746013	0002387264
0002594125	0002645927	0003745130	0002638641
0002594778	0003745940	0004329652	0003756590
0003748449	0009764655	0018570812	0002477636
0002590586	0003773975	0003770815	0002476281
0002594067	0002505519	0004984845	0003759917
0003748514	0003737384	0003774262	0004318895
0003748506	0002645927	0002645612	0003741253
0003723756	0003742897	0003740008	0002477610
0002593986	0003774460	0002643799	0004310298
0003748522	0002607224	0003774478	0003740610
0003748589	0002645497	0004073680	0003755808
0002592509	0004322095	0003756590	0004383139
0002593655	0004329611	0004328134	0002477693
0003727146	0004318556	0003741550	0002477610
0003741964	0003742467	0004329314	0003742384
0003757838	0004323556	0003746542	0002477743
0003730959	0003788940	0004327417	0002477503
0002593481	0003747722	0003738275	0003740628

FCC Registration Number for Tariff 5 Participants

0002477651	0004269544	0003772274	0001678044
0003755832	0002331262	0002212314	0004333035
0004313342	0005069372	0002490472	0004973301
0003745940	0002332930	0002504058	0004321733
0002430684	0002330843	0004269528	0001664481
0002432672	0002333839	0004374047	0004278339
0002426831	0004322889	0024113037	0003757580
0004935730	0005081567	0004746863	0001677335
0004979688	0002331601	0004337044	0004320909
0023758238	0004973202	0003737376	0004251419
0002405215	0004340410	0024113052	0001685841
0003741550	0004362364	0003733847	0004273850
0002432672	0004322079	0004930277	0004322814
0002430684	0004928750	0004362505	0004320883
0004329587	0002339976	0004269809	0004374039
0003709888	0005069935	0024113060	0004321113
0004322301	0004310694	0005139662	0003738739
0002426559	0002334795	0004362364	0004285474
0003739976	0002334225	0004924866	0001678788
0002430916	0002333649	0004365276	0004384517
0002430536	0004310769	0001700947	0004275137
0002477651	0002329662	0003708161	0001687557
0003728680	0004924866	0001698752	0004280665
0003758877	0002333888	0001700186	0003757564
0003745981	0003723236	0001700905	0001685718
0003784477	0005069323	0004365318	0004278453
0003716438	0002334407	0003732609	0001644798
0002430510	0002335099	0003723517	0001678804
0003749199	0002333672	0001701275	0001607845
0002430163	0002334555	0001700459	0014295679
0003732302	0004948253	0004365334	0004266664
0004268918	0005010996	0004344776	0001601996
0025531922	0003730835	0001699412	0001603042
0025531930	0003722477	0001700418	0004052791
0001730142	0014710388	0001699776	0004310306
0004283917	0002334225	0003733839	0001623024
0001730969	0004928750	0003709458	0001649847
0004287538	0007196207	0003708054	0003723236
0001730944	0002549392	0004320412	0004311627
0001731850	0004269817	0004325213	0003754652
0001732668	0003741956	0004269718	0003766201
0005076922	0003748043	0025531955	0004317731
0004325403	0002550309	0001715937	0004338489
0001731785	0004269775	0004381323	0001616200
0001731710	0005061189	0001684166	0003723509
0001730126	0002505519	0004333407	0004312187
0001731280	0003736238	0001676519	0004311809
0003778594	0004928792	0004330874	0004327011

FCC Registration Number for Tariff 5 Participants

0004337374	0004335808	0001562388
0003728284	0004339784	0003738986
0001615889	0001607175	0001543347
0005059092	0004335816	0001734888
0004328472	0001623149	0001546746
0001615665	0001646140	0001546068
0002147098	0001629781	0001551837
0004326070	0003744406	0001545748
0001616192	0003744463	0003719929
0004939864	0003785300	0011131513
0003714805	0011396082	0001549914
0001623321	0001581297	0001537133
0003801925	0004321444	0003801925
0004255303	0003732484	0001551423
0001623024	0003762465	0004339800
0004937827	0001583350	0001585397
0001623818	0004329884	0001596717
0004321790	0005061544	0001596667
0001551423	0001584275	0002801256
0001583350	0004528410	0012207346
0004975769	0004330353	0001570936
0001647734	0006662423	0004980843
0004331724	0001583194	0003737665
0001646140	0004321451	0005079314
0001643006	0001581974	0018760876
0001648039	0001565829	0001572932
0003729316	0004340949	0003739521
0029046562	0004329710	0004325148
0003729316	0004953980	0003739554
0005080122	0004923587	0001584960
0001664481	0003716255	0005020169
0001603042	0004986410	0004334512
0004320297	0001559798	0004980876
0001607845	0005063078	0001569466
0001616937	0003727054	0004986477
0001618008	0003716263	0011458999
0001675461	0004273454	0001726488
0001667765	0004337689	
0001618081	0004337721	
0001607829	0004381174	
0014860530	0009965104	
0011862927	0003738994	
0004335782	0003738986	
0001607340	0002801256	
0004473682	0001566629	
0004484895	0004315461	
0001590595	0001565316	
0004939724	0004979555	