

NATIONAL EXCHANGE CARRIER ASSOCIATION, INC.

ACCESS SERVICE
TARIFF F.C.C. No. 5

TRANSMITTAL NO. 1721
JUNE 17, 2024

VOLUME 1: DESCRIPTION AND JUSTIFICATION

Defines the purpose of the filing, describes the rate structure of the access services and summarizes results.

VOLUME 1-2: TARIFF REVIEW PLAN

VOLUME 2: DEVELOPMENT OF ACCESS ELEMENT REVENUE
REQUIREMENTS

Provides a projection of the companies' interstate investments, expenses, revenues and taxes for the past year cost of service study and test year.

VOLUME 3: DEVELOPMENT OF BASELINE DEMAND AND REVENUES

Provides the development of the demand quantities and revenues for the test year at current rates.

VOLUME 4: COMMON LINE RATE DEVELOPMENT

Describes and documents the procedures used to develop Common Line Rates, Federal Universal Service Charges, and Consumer Broadband-only Loop rates.

VOLUME 5: TRAFFIC SENSITIVE RATE DEVELOPMENT

Describes and documents the procedures to develop recurring and non-recurring rate levels for Switched Access and Special Access services. It also describes the procedures used to develop miscellaneous charges for additional engineering, maintenance and testing of these services, as well as describing the development of Eligible Recovery, ARC rates, and CAF ICC support estimates.

TRANSMITTAL NO. 1721

Volume 1
DESCRIPTION AND JUSTIFICATION

TABLE OF CONTENTS

Section 1

INTRODUCTION	1
A. SUMMARY OF CHANGES	7
1. Pool Participation Changes	7
2. Revenue Requirement Changes	9
3. Universal Service Support Programs	11
4. Demand Changes	16
5. Rates Changes	17

Section 2

DESCRIPTION OF STUDIES	19
A. PROJECTED REVENUE REQUIREMENT FORECAST	20
B. NECA EXPENSE RECOVERY	22
C. PROJECTED DEMAND QUANTITIES	22

Section 3

RATE DEVELOPMENT OVERVIEW	25
A. COMMON LINE RATE DEVELOPMENT	25
1. Subscriber Line Charges (SLCs)	26
2. Federal Universal Service Charge (FUSC)	26
B. CONSUMER BROADBAND-ONLY LOOP RATE DEVELOPMENT	27
C. TRAFFIC SENSITIVE RATE DEVELOPMENT	28
1. Local Switching and Information Surcharge	29
2. Local Transport	30
3. Summary of Switched Access Revenue	31
4. Special Access Rate Development	31

Section 4

TRAFFIC SENSITIVE EARNINGS AND ATTRIBUTION ANALYSIS	33
A. ATTRIBUTION ANALYSIS	33
B. THREE "FORM 492" REPORT VIEWS	37
C. SCORECARD	38
1. Demand Growth Comparisons: Filed to Actual Access Lines, Switched MOU and Special Access Revenue	38
2. Revenue Requirement Growth Comparisons: Filed to Actual for Special Access	40
D. SUMMARY	42

EXHIBITS 1 – 4

Appendix A: NECA POOL PARTICIPANTS FOR PROSPECTIVE TEST YEAR

Appendix B: SIDE BY SIDE TARIFF COMPARISONS

Appendix C: EXCHANGE CARRIERS ELECTING TO EXIT NECA'S CBOL and/or DSL
TARIFF PURSUANT TO CC DOCKET NO. 02-33 NOTICE

Appendix D: CARRIER CERTIFICATIONS

Volume 1
DESCRIPTION AND JUSTIFICATION

Section 1

INTRODUCTION

The National Exchange Carrier Association, Inc. (NECA) hereby files its 2024 Annual Access Tariff revisions for the 2024/2025 test period to reflect the cost and demand characteristics of its pool participants.¹ NECA proposes revisions to its common line (CL) revenue requirement recovery, Consumer Broadband-only Loop (CBOL) rates and traffic sensitive (TS) rates to be effective July 2, 2024. These proposed rates are designed to recover the test period CL, CBOL, and special (SP) access revenue requirements at the authorized rate of return (RoR) of 9.75 percent.²

This filing does not include cost or revenue data or rates associated with SP access for those companies that elected Enhanced ACAM support³ and subsequently opted to move their

¹ The Commission has established July 2, 2024 as the effective date for Annual Access Tariff filings made on 15 days' notice. *See July 1, 2024 Annual Access Charge Tariff Filings*, WC Docket No. 24-41, Order, DA 24-294 (rel. Mar. 27, 2024) (*2024 Procedures Order*).

² *See Connect America Fund*, WC Docket No. 10-90, *ETC Annual Reports and Certifications*, WC Docket No. 14-58, *Developing a Unified Intercarrier Compensation Regime*, CC Docket No. 01-92, Report and Order, Order and Order on Reconsideration, and Further Notice of Proposed Rulemaking, 31 FCC Rcd. 3087 (2016) (*2016 USF RoR Reform Order*).

³ *See Connect America Fund: A National Broadband Plan for Our Future High-Cost Universal Service Support*, WC Docket No. 10-90, *ETC Annual Reports and Certifications*, WC Docket No. 14-58, *Telecommunications Carriers Eligible to Receive Universal Service Support*, WC Docket No. 09-197, *Connect America Fund – Alaska Plan*, WC Docket No. 16-271, *Expanding Broadband Service Through the ACAM Program*, RM-11868, Report and Order, Notice of Proposed Rulemaking, and Notice of Inquiry, FCC 23-60 (rel. July 24, 2023) (*Enhanced ACAM Order*). *See also* National Exchange Carrier Association, Inc., Tariff F.C.C. No. 5, Transmittal No. 1709 (filed Dec. 18, 2024) (*Enhanced ACAM Filing*).

Business Data Services (BDS) to the incentive pricing framework.⁴ Carriers electing the incentive pricing framework for BDS are required to remove their costs and revenues associated with BDS and other SP access services from the NECA pool.⁵ BDS rates for study areas opting to have NECA tariff those services are included in NECA Tariff F.C.C. No. 6 and are filed separately.⁶

Historically, TS pool participants had to participate in the pooling of revenues and costs for both switched (SW) access and SP access services. Companies that have moved to the BDS incentive pricing framework (“BDS Carriers”) have the option to remain in the SW access portion of the TS pool only.⁷ These carriers are referred to as “TS-SW only” throughout this filing unless otherwise designated. The switched access and special access portions of the TS pool are referred to either as “TS” or “SW” and “SP”. “TS–SW” refers to study areas participating in the switched access portion of the TS pool, regardless of whether they participate in the special access portion of the pool or not.

This filing reflects the ongoing effects on SW access rates resulting from the Commission’s Universal Service Fund (USF) and Intercarrier Compensation (ICC)

⁴ See 47 C.F.R. § 61.50. See also *Regulation of Business Data Services for Rate-of-Return Local Exchange Carriers*, WC Docket No. 17-144, *Business Data Services in an Internet Protocol Environment*, WC Docket No. 16-143, *Special Access for Price Cap Local Exchange Carrier*, WC Docket No. 05-25, Report and Order, 33 FCC Rcd. 10403 (2018) (*RoR BDS Order*).

⁵ 47 C.F.R. § 61.50(d).

⁶ See NECA Tariff F.C.C. No 6, Transmittal 1722 (filed June 17, 2024) (*2024 Tariff No. 6 Filing*).

⁷ See *RoR BDS Order* ¶ 29.

Transformation Order⁸ and the *8YY Access Charge Reform Order*.⁹ This filing also reflects impacts of the Second Order on Reconsideration and Clarification, released February 16, 2018,¹⁰ affecting CBOL and SP access revenue requirements and rates as described herein. In addition, this filing reflects the Report and Order and Third Order on Reconsideration released March 23, 2018¹¹ affecting revenue requirements described in Volume 2, as well as CL and CBOL revenue requirements and resulting CAF Broadband Loop Support (CAF BLS), described in Volume 4.

Volume 2, Section 3.B.3 and Volume 2, Exhibit 8 reflect the *2018 USF Forbearance Order* granting temporary forbearance from the application of USF contribution requirements on broadband internet access transmission services provided by rural incumbent local exchange

⁸ *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 a 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 – Mobility Fund*, WT Docket No. 10-208, Report and Order and FNPRM, 26 FCC Rcd. 17663 (2011) (*USF/ICC Transformation Order*), petitions for review denied *In re: FCC 11-161*, No. 11-9900 (10th Cir. May 23, 2014).

⁹ *8YY Access Charge Reform*, WC Docket No. 18-156, Report and Order, 35 FCC Rcd. 11594 (2020) (*8YY Access Charge Reform Order*).

¹⁰ *Connect America Fund*, WC Docket No. 10-90, *ETC Annual Reports and Certifications*, WC Docket No. 14-58, *Developing a Unified Intercarrier Compensation*, CC Docket No. 01-92, Second Order on Reconsideration and Clarification, 33 FCC Rcd. 2399 (2018) (*February 16, 2018 Order*).

¹¹ *Connect America Fund*, WC Docket No. 10-90, *ETC Annual Reports and Certifications*, WC Docket No. 14-58, *Establishing Just and Reasonable Rates for Local Exchange Carriers*, WC Docket No. 07-135, *Developing a Unified Intercarrier Compensation Regime*, CC Docket No. 01-92 Report and Order, Third Order on Reconsideration, and Notice of Proposed Rulemaking, 33 FCC Rcd. 2990 (2018) (*March 23, 2018 Order*).

carriers (LECs).¹² This filing also reflects the effects of the *2024 Modification of Average Schedules*.¹³

Required carrier certifications are contained in Volume 1, Appendix D. Exhibit 1 of Appendix D contains certifications to the effect that carriers are not seeking duplicative recovery in the state jurisdiction for any Eligible Recovery subject to the CAF ICC recovery mechanism.¹⁴ Appendix D Exhibit 2 contains certifications to the effect that carriers have complied with sections 51.917(d) and (e) of Commission rules, and after doing so are eligible to receive CAF ICC support.¹⁵ Appendix D Exhibit 3 contains certifications as to the accuracy of data supplied by carriers to NECA in support of the computation of Access Recovery Charge (ARC) rates and estimated CAF ICC calculations.¹⁶ The frozen baseline revenue data for SW access included in this filing reflects data previously filed with the Federal Communications Commission (FCC) and Universal Service Administrative Company (USAC) for all study areas. This filing also considers the FCC's order released on February 24, 2015, addressing companies with over- or under-recovery of the true-up test period Eligible Recovery amounts.¹⁷

¹² *Petition of NTCA—The Rural Broadband Association and the United States Telecom Association for Forbearance Pursuant to 47 U.S.C. § 160(c) from Application of Contribution Obligations on Broadband Internet Access Transmission Services*, WC Docket No. 17-206, Order, 33 FCC Rcd. 5712 (2018) (*2018 USF Forbearance Order*).

¹³ See *National Exchange Carrier Association 2024 Modification of Average Schedules*, attach. to Letter from Robert J. Deegan, Director-Government Relations, NECA, to Marlene H. Dortch, Secretary, FCC, WC Docket 23-415 (filed Dec. 21, 2023); *National Exchange Carrier Association, Inc. 2024 Modification of Average Schedules*, WC Docket No. 23-415, Order, DA 24-435 (rel. May 10, 2024); *National Exchange Carrier Association, Inc. 2024 Modification of Average Schedules*, WC Docket No. 23-415, Order on Reconsideration, DA 24-517 (rel. June 5, 2024) (*2024 Modification of Average Schedules*).

¹⁴ See 47 C.F.R. § 51.917(d)(1)(vii).

¹⁵ See 47 C.F.R. § 51.917(f)(2).

¹⁶ These certifications will be filed with USAC on June 17, 2024 in support of carrier data underlying calculations of Eligible Recovery, ARC rates and estimated CAF ICC support amounts.

¹⁷ See *Connect America Fund*, WC Docket No. 10-90, *Developing a Unified Intercarrier Compensation Regime*, CC Docket No. 01-92, Order, 30 FCC Rcd. 1887 (2015) (*February 24, 2015 Order*).

Exhibit 4 of Appendix D contains carrier certifications as to the accuracy of the carriers' CAF BLS data. The CAF BLS data certification was achieved via the Form 508 certifications filed in the March 29, 2024 CAF BLS filing with USAC. For companies that updated their CBOL data with USAC after the filing, new certifications attesting to the accuracy of a carrier's data underlying this filing were obtained.

Volume 2 of this filing contains cost support materials. Demand forecasting methods are described in Volume 3. Volume 4 describes CL, CBOL, and Federal Universal Service Charge (FUSC) rate development.

The development of ARC rates and CAF ICC support estimates are included in Volume 5 along with TS rate development. ARC rates and CAF ICC support estimates have been developed according to sections 51.917(d) and (e) of Commission rules.¹⁸ CAF ICC support estimates have been reduced by imputed ARC revenues on consumer broadband-only loops, as required by the *2016 USF RoR Reform Order*. The imputed ARC revenues for the upcoming test period are no longer limited because the five year time period to do so ended June 30, 2023 pursuant to rule revisions adopted in the *February 16, 2018 Order*.¹⁹

The effect of CAF BLS is reflected in the recovery of CL pool and CBOL revenue requirements. This filing reflects the limitation of Corporate Operations Expense amounts, including the use of broadband-only loops in the Corporate Operations Expense formula,²⁰ on CL revenue requirements as required by the *USF/ICC Transformation Order* for the calculation

¹⁸ See 47 C.F.R. § 51.917(d)-(e).

¹⁹ See 47 C.F.R. § 51.917(f)(4)-(5); see also *February 16, 2018 Order* ¶ 17 .

²⁰ *March 23, 2018 Order* ¶ 88.

of CAF BLS amounts.²¹ This filing also reflects the limitation on Operating Expense amounts required by the *2016 USF RoR Reform Order*.²² Operating Expense limits reflect adjusted limits for tribal land study areas as well as for study areas whose mergers were subject to FCC-imposed conditions limiting Operating Expenses.²³

FUSCs are separate rate elements designed to recover CL pool members' contributions to USF support mechanisms. ARC revenues are assumed to be interstate retail revenues for purposes of computing federal USF assessments, and are therefore assessed a FUSC, except for imputed ARC revenues associated with CBOL lines and not billed to end users. Projected test period FUSC revenue is displayed in Volume 4 of this filing.

This filing includes an update of pool earnings reported in NECA's preliminary Form 492 reports filed in March, a projection of final earnings results, and a reconciliation of proposed rate changes to those projections. This reconciliation includes data and analyses relating proposed rate changes to changes in cost and demand, exits from and entrances to the pools, and earnings trends. Results of these analyses for TS SP access are displayed in Section 4 of this Volume. Reconciliation is no longer necessary for TS SW access because rates and revenue requirements are prescribed by the *USF/ICC Transformation Order*.

²¹ See *USF/ICC Transformation Order* ¶¶ 227-233.

²² *2016 USF RoR Reform Order* ¶¶ 95-115.

²³ See *Connect America Fund*, WC Docket No. 10-90, Report and Order, 33 FCC Rcd. 3602 (2018); *Connect America Fund*, WC Docket No. 10-90, Order on Reconsideration, 33 FCC Rcd. 12813 (2018); *Wireline Competition Bureau Updates List of Carriers Meeting Eligibility Criteria for Tribal Opex Relief*, WC Docket No. 10-90, Public Notice, 33 FCC Rcd. 12556 (2018); *Joint Application of W. Mansfield Jennings Limited Partnership and Hargray Communications Group, Inc., for Consent to the Transfer of Control of ComSouth Corporation Pursuant to Section 214 of the Communications Act of 1934*, WC Docket No. 18-52, Memorandum Opinion and Order, 33 FCC Rcd. 4780 (2018). See, e.g., *Domestic Section 214 Applications Granted Subject to Condition*, WC Docket Nos. 17-101, 17-365, 18-68, 18-94, 18-95, 18-177, Public Notice, 33 FCC Rcd. 6784 (2018); *Domestic Section 214 Application Granted Subject to Condition*, WC Docket No. 18-223, Public Notice, 33 FCC Rcd. 9417 (2018); *Domestic Section 214 Applications Granted Subject to Condition*, WC Docket Nos. 18-301, 18-302, Public Notice, 33 FCC Rcd. 12236 (2018). (*Orders and Public Notices re: OpEx limits*).

This filing also provides information on total company costs, as well as several years' worth of actual cost trend data in support of earnings and tariff projections. This analysis for TS SP access revenue requirements is described in Volume 2. Analysis for TS SW access revenue requirements is no longer necessary because revenue requirements are frozen at levels underlying the *2011 Annual Access Tariff Filing*, reduced by 5 percent annually starting with the 2012/2013 test period.²⁴

NECA seeks confidential treatment of the data contained in this filing pursuant to the *2024 Protective Order* designated for use in the 2024 Annual Access Charge Tariff Filings proceeding.²⁵

A. SUMMARY OF CHANGES

1. Pool Participation Changes

Current Commission rules provide for an annual NECA tariff election on March 1 of each year to go into effect for the following test period.²⁶ The following summarizes the changes in NECA pool status effective July 2024. Companies no longer in the CL pool have the

²⁴ See NECA Tariff F.C.C. No. 5, Transmittal No. 1314 (filed June 16, 2011) (*2011 Annual Access Tariff Filing*); NECA Tariff F.C.C. No. 5, Transmittal No. 1347 (filed June 18, 2012) (*2012 Annual Access Tariff Filing*); NECA Tariff F.C.C. No. 5, Transmittal No. 1389 (filed June 17, 2013) (*2013 Annual Access Tariff Filing*); NECA Tariff F.C.C. No. 5, Transmittal No. 1423 (filed June 16, 2014) (*2014 Annual Access Tariff Filing*); NECA Tariff F.C.C. No. 5, Transmittal No. 1455 (filed June 16, 2015) (*2015 Annual Access Tariff Filing*); NECA Tariff F.C.C. No. 5, Transmittal No. 1489 (filed June 16, 2016) (*2016 Annual Access Tariff Filing*); NECA Tariff F.C.C. No. 5, Transmittal No. 1519 (filed June 16, 2017) (*2017 Annual Access Tariff Filing*); NECA Tariff F.C.C. No. 5, Transmittal No. 1549 (filed June 18, 2018) (*2018 Annual Access Tariff Filing*); NECA Tariff F.C.C. No. 5, Transmittal No. 1579 (filed June 17, 2019) (*2019 Annual Access Tariff Filing*); NECA Tariff F.C.C. No. 5, Transmittal No. 1607 (filed June 16, 2020) (*2020 Annual Access Tariff Filing*); NECA Tariff F.C.C. No. 5, Transmittal No. 1635 (filed June 16, 2021) (*2021 Annual Access Tariff Filing*); NECA Tariff F.C.C. No. 5, Transmittal No. 1665 (filed June 16, 2022) (*2022 Annual Access Tariff Filing*); NECA Tariff F.C.C. No. 5, Transmittal No. 1694 (filed June 16, 2023) (*2023 Annual Access Tariff Filing*).

²⁵ See *Procedures for Obtaining Confidential Information from 2024 Annual Access Charge Tariff Filings*, Public Notice, WC Docket No. 24-41, DA 24-509 (rel. May 31, 2024) (*2024 Protective Order*).

²⁶ See 47 C.F.R. § 69.3(e)(9).

option of tariffing their CL rates with NECA,²⁷ but their decision to do so does not affect the CL pool cost and demand data included in this filing.

NECA Tariff	Number of Study Areas	
	Enter	Exit
Common Line	0	0
Traffic Sensitive – SW and SP	1	49
Traffic Sensitive – SW Only	1	1

For the 2024/2025 test period, there are 306 study areas participating in the CL pool. There are 578 study areas participating in the TS – SW and SP pool plus an additional 177 study areas participating in the TS-SW only part of the pool, for a total of 755 study areas participating in the TS pool. Exhibit 1 of this Volume displays those LECs electing to change participation.²⁸ Appendix A lists all pooling LECs and their tariff participation for the 2024/2025 test period.²⁹ Appendix B shows side-by-side tariff comparisons for study areas electing to join NECA’s tariffs.³⁰ Appendix C provides a list of the exchange carriers electing not to participate in NECA’s Digital Subscriber Line (DSL) or CBOL tariff effective July 2, 2024 because they are opting to offer the service on a detariffed common carrier basis, on a private carriage basis, or

²⁷ 2016 USF RoR Reform Order ¶ 196.

²⁸ NECA previously provided notice to the Commission of these pool election changes. See Letter from Susan Boylan, Senior Director – Access Tariff Cost Development, NECA, to Trent Harkrader, Chief, Wireline Competition Bureau (filed Mar. 25, 2024); Letter from Susan Boylan, Senior Director – Access Tariff Cost Development, NECA, to Trent Harkrader, Chief, Wireline Competition Bureau (filed April 4, 2024) (addendum to March 2024 tariff election letter).

²⁹ Appendix A reflects pooling companies that are projected to be in the tariff from July 2, 2024 through June 30, 2025. See 2023 Annual Access Tariff Filing, Vol. 1, App. A for a list of companies included in the 2023/2024 test period.

³⁰ This comparison identifies differences between the LEC’s current tariff and NECA’s tariff scheduled to become effective July 2, 2024. NECA tariff revisions reflect only changes from the currently effective NECA tariff.

electing to discontinue provision of a separate transmission service.³¹ Specifically, Appendix C, Workpapers 1 and 2 list carriers exiting NECA's CBOL and DSL tariff, respectively.

2. Revenue Requirement Changes

Revenue requirement projections for NECA's CL pool and the SP access portion of the TS pool reflect tariff participation changes, projected changes in cost company revenue requirements and average schedule settlements, the Corporate Operations Expense and Operating Expense limitations on CL revenue requirements, the transfer of broadband-only loop costs from SP access to the CBOL element in CL consistent with Part 36 and Part 69 cost allocation rules as directed in the *February 16, 2018 Order*,³² and an authorized RoR of 9.75 percent per the *2016 USF RoR Reform Order*. As required by the *USF/ICC Transformation Order*, interstate SW access revenue requirements have been frozen at the base period, defined as amounts underlying the 2011 tariff filing, and reduced by 5 percent annually beginning with the 2012/2013 test period.³³

Special access revenue requirement projections reflect the continuation of slightly negative growth, due to the migration from voice-data lines to broadband-only loops, network changes, and continued deployment of more cost-efficient technologies. NECA continues to reflect the effect of the *Separations Freeze Order* in the development of projected revenue

³¹ See *Appropriate Framework for Broadband Access to the Internet over Wireline Facilities*, CC Docket Nos. 02-33, 01-337, 95-20, 9810 and WC Docket Nos. 04-242 and 05-271, Report and Order and Notice of Proposed Rulemaking, 20 FCC Rcd. 14853 (2005) ¶ 94 (*Wireline Broadband Order*); *Protecting and Promoting the Open Internet*, GN Docket No. 14-28, Report and Order on Remand, Declaratory Ruling, and Order, 30 FCC Rcd. 5601 (2015) ¶ 460, n.1378 (*2015 Open Internet Order*), *aff'd sub nom USTA v. FCC*, No. 15-1063 (D.C. Cir. June 14, 2016); *2016 USF RoR Reform Order* ¶¶ 193-194, n. 428; *Connect America Fund, et al.*, WC Docket No. 10-90, *et al.*, Order, 31 FCC Rcd. 6856 (2016) ¶ 25.

³² See *February 16, 2018 Order* ¶ 9. See also 47 C.F.R. § 69.311 and § 69.416.

³³ See *USF/ICC Transformation Order* ¶¶ 39, 851, 899. See also 47 C.F.R. § 51.917.

requirements.³⁴ Allocation factors and category relationships, where applicable,³⁵ in effect as of calendar year 2000, were frozen and used for test period projections, with the exception of study areas that elected to unfreeze their category relationships effective July 2019, as documented in the 2019 Annual Access Tariff Filing.³⁶ While there were additional opportunities for certain study areas to unfreeze their category relationships after 2019, no study areas in NECA Tariff F.C.C. No. 5 for the upcoming test period opted to do so.

Projected test period revenue requirements for 2024/2025 pool participants are displayed in Table 1 below. CL including CBOL and TS SP access revenue requirements for both Past Year Cost of Service (PYCOS) and the 2024/2025 test period are calculated at a 9.75 percent RoR and reflect test period pool composition. The development of revenue requirements is described further in Volume 2.

³⁴ *Jurisdictional Separations and Referral to the Federal-State Joint Board*, Report and Order, CC Docket No. 80-286, 16 FCC Rcd. 11382 (2001) (*Separations Freeze Order*). The Separations Freeze has been extended on several occasions, most recently with a Report and Order on December 17, 2018, in which the FCC extended the freeze until the earlier of December 31, 2024, or the completion of comprehensive reform of the Part 36 jurisdictional separations rules. *See Jurisdictional Separations and Referral to the Federal-State Joint Board*, Order and Further Notice of Proposed Rulemaking, CC Docket No. 80-286, 21 FCC Rcd. 5516 (2006), Report and Order, 24 FCC Rcd. 6162 (2009); Report and Order, 25 FCC Rcd. 6046 (2010); Report and Order, 26 FCC Rcd. 7133 (2011); Report and Order, 27 FCC Rcd. 5593 (2012); Report and Order, 29 FCC Rcd. 6470 (2014); Report and Order, 32 FCC Rcd. 4219 (2017); and Report and Order and Waiver, 33 FCC Rcd. 12743 (2018).

³⁵ For RoR companies, the freeze of category relationships was optional. *See* 47 C.F.R. § 36.3(b). There are fourteen RoR study areas in NECA's CL or TS pool with frozen category relationships for the 2024/2025 test period.

³⁶ *See* Volume 2, Section 3.A.1 and Volume 5, Section 4.B.

Table 1 Summary of Revenue Requirement Changes
(in millions)

Access Element	PYCOS 2023	Test Period 2024/2025	Annual % Chg.*
Common Line (includes CBOL)	\$1,134.4.2	\$1,279.08	8.32%
TS Switched Access			
Interstate	N/A	\$164.7	N/A
Intrastate	N/A	\$88.6	N/A
Net Reciprocal Compensation	N/A	\$14.6	N/A
TS Special Access	\$223.4	\$213.1	-3.08%

* Annual percent change = $((\text{Test Period}/\text{PYCOS})^{2/3} - 1) * 100$

3. Universal Service Support Programs

CAF ICC Support

The *USF/ICC Transformation Order* established CAF ICC support as a universal service support mechanism designed to recover SW access Eligible Recovery amounts not recovered through ARC rates. Section 4 of Volume 5 describes methodologies used to develop SW access Eligible Recovery, ARC rates and revenue, and estimated CAF ICC support at the study area level. Test period CAF ICC support projections include the effects of prior period true-up data per Commission rules.³⁷ In this filing, 2024/2025 projected Eligible Recovery and estimated CAF ICC support include the effects of true-up revenues and exogenous costs from the 2022/2023 test period, including adjustments for Transitional Intrastate Access Service revenue, Interstate Switched Access revenue, Reciprocal Compensation, and ARC revenues. Exogenous costs include incremental Telecommunications Relay Service (TRS) Fund fees, Regulatory Fees,

³⁷ See 47 C.F.R. § 51.917(d)(1)(iii).

and North America Numbering Plan Administration (NANPA) fees not recovered through capped SW access rates.³⁸ The *2022 Annual Access Tariff Filing* first included a safeguard to ensure carriers receiving model-based support that voluntarily reduce common line rates (excluding CBOLs) do not recover the associated foregone revenues through the reporting of incremental exogenous costs. This year, no model company with a voluntarily reduced common line rate reported projected incremental exogenous costs for cost recovery. This is also described in Volume 5, Section 4.

In addition, CAF ICC support amounts have been reduced by imputed ARC revenues on residential, Single Line Business (SLB) and Multi-Line Business (MLB) broadband-only loop counts. In NECA's CAF ICC Data Collection, companies entered the projected residential broadband-only loop counts at the exchange level. Further details on this data, including required details supporting the use of a weighted average business ARC rate in certain cases, are described in Volume 5, Section 4.B.8. For TS pool members, the total imputed ARC revenues on broadband-only loop counts is \$10.8M as displayed on Line 8 of Volume 5, Exhibit 11, Workpaper 8 of 8. The total estimated CAF ICC support amount for the 2024/2025 test period for TS pool members is \$197.2M and is displayed on Line 9 of that same exhibit and has been reduced by the imputed ARC revenues.

Throughout this filing, switched access data prior to inclusion of the applicable true-up period data effects are referred to as "pre true-up." Switched access data after inclusion of true-up period effects are referred to as "post true-up".

³⁸ *Connect America Fund*, WC Docket No. 10-90, *Developing an Unified Intercarrier Compensation Regime*, CC Docket No. 01-92, Order, 29 FCC Rcd. 3245 (2014) ¶ 15 (*March 31, 2014 Clarification Order*).

Adjustments to the Eligible Recovery amounts underlying CAF ICC support estimates have been made to ensure carriers avoid double (duplicative) recovery. Volume 1, Appendix D, Exhibit 1 lists carriers certifying they are not seeking duplicative recovery for any Eligible Recovery subject to the CAF ICC recovery mechanism. Under the FCC's *March 31, 2014 Clarification Order*, reductions needed to avoid double recovery are to be applied to projected Eligible Recovery amounts and not to the frozen baseline.³⁹

Table 2 below displays counts of study areas that have reported double recovery events in the CAF ICC Data Collection over the past ten years. These counts of reported events reflect TS pool participation from each respective period, and result in a cumulative reduction to Eligible Recovery for the 2024/2025 test period. Double recovery reductions to the projected 2024/2025 Eligible Recovery amount by study area are displayed in NECA's TRP. Total interstate and total intrastate double recovery dollars are shown in Volume 5, Exhibit 11, Workpapers 1 and 2, respectively. Frozen baseline data was not adjusted for double recovery. Rather, these reductions were applied to projected 2024/2025 Eligible Recovery to avoid over-recovery.

³⁹ *Id.* ¶ 16. See also 47 C.F.R. § 51.917(d)(1)(vii), effective June 19, 2014.

Table 2
Count of reported Double Recovery occurrences in CAF ICC data collection

Year Reported	Count
2015	42
2016	34
2017	15
2018	14
2019	9
2020	9
2021	4
2022	2
2023	4
2024	5

Connect America Fund Broadband Loop Support Voice (CAF BLS Voice)

In the *MAG Order*⁴⁰ the Commission created Interstate Common Line Support (ICLS)⁴¹ as an explicit universal service support mechanism. In the *2016 USF RoR Reform Order*, the Commission defined CAF BLS Voice support to recover the amounts previously recovered by ICLS, subject to limitations on Operating Expense amounts.⁴² The test period CAF-BLS Voice

⁴⁰ See *Multi-Association Group (MAG) Plan for Regulation of Interstate Services of Non-Price Cap Incumbent Local Exchange Carriers and Interexchange Carriers*, CC Docket No. 00-256, *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, *Access Charge Reform for Incumbent Local Exchange Carriers Subject to Rate-of-Return Regulation*, CC Docket No. 98-77, *Prescribing the Authorized Rate of Return for Interstate Services of Local Exchange Carriers*, CC Docket No. 98-166, Second Report and Order and Further Notice of Proposed Rulemaking in CC Docket No. 00-256, Fifteenth Report and Order in CC Docket No. 96-45, and Report and Order in CC Docket Nos. 98-77 and 98-166, 16 FCC Rcd. 19613 (2001) (*MAG Order*).

⁴¹ ICLS was calculated on a study area basis by subtracting the sum of the study area's projected end user revenue, special access surcharge revenue and line port charge revenue from its projected CL revenue requirement. Calculations reflected the impact of the corporate operations expense limitation on CL revenue requirement. See *USF/ICC Transformation Order* ¶¶ 227-233.

⁴² *2016 USF RoR Reform Order* ¶¶ 87-88.

amount in NECA's CL pool is projected to be \$295.6M prior to implementation of the \$200/line/month cap and application of the budget control mechanism (BCM).⁴³

CAF BLS Broadband-Only Support

In the *2016 USF RoR Reform Order*, the Commission created CAF BLS Broadband-only support to support the cost of CBOLs effective January 1, 2017. CAF BLS Broadband-only support is calculated on a study area basis. Data used to calculate projected support amounts for the 2024/2025 test period were filed by NECA on March 29, 2024 and are supplemented with more recent exchange carrier updates for use in the development of CBOL rates as discussed in Volume 4. The data-only loop revenue requirement is shifted from the SP access category to the CBOL category. The development of CBOL revenue requirement is not subject to caps or limitations for CBOL rate development per FCC clarification and is described in detail in Volume 2. However, the revenue requirement underlying the CAF BLS Broadband-only support is subject to the Corporate Operations Expense limitation per the *USF/ICC Transformation Order*⁴⁴ and the *March 23, 2018 Order*, and subject to an Operations Expense limitation as required by the *2016 USF RoR Reform Order*.⁴⁵ The test period CAF BLS Broadband-only support amount for study areas in NECA's CBOL tariff is projected to be \$628.5M prior to the implementation of the \$200/line/month cap and application of the BCM.

⁴³ The budget control mechanism was created as a method to enforce the budget for RoR carriers. *See id.* ¶¶ 146-155.

⁴⁴ *See USF/ICC Transformation Order* ¶¶ 227-233.

⁴⁵ *See 2016 USF RoR Reform Order* ¶¶ 95-115.

4. Demand Changes

Table 3 displays the projected change in demand between base period 2023 and the test period for NECA pooling companies for key demand elements. The growth rates reflect the continued migration of demand towards broadband, wireless, and Voice over Internet Protocol (VoIP) services. Development of test period access rate element demand is discussed further in Section 2 of this volume, and Volume 3.

Table 3
Summary of Demand Changes
(in millions)

Access Element	Base Pd. 2023*	Test Pd. 2024/2025	Annual % Chg.**
Total Lines – CL	1.300	1.316	0.8%
Interstate Local Switching (LS) Minutes of Use (MOU) – TS	1,015.3	770.4	-14.6%
Intrastate Terminating Minutes of Use (MOU) – TS	987.9	857.9	-7.7%
Special Access Constant Rate Revenue – TS***	\$225.0	\$190.7	-10.4%

*Base period 2023 is calendar year 2023 for access lines and special access revenue and a time period from October 1, 2022 through September 30, 2023 for interstate LS MOU and intrastate terminating MOU.

** Annual % change = $\left(\frac{\text{test pd.}}{\text{base pd.}}\right)^{1/21} - 1$ * 100 for access lines and special access revenue. Annual % change = $\left(\frac{\text{test pd.}}{\text{base pd.}}\right)^{12/21} - 1$ * 100 for interstate LS MOU and intrastate terminating MOU.

*** Constant rate is defined as unbanded June 2024 rate.

5. Rate Changes

Table 4 below displays some of the key rate changes proposed in this filing. The proposed increase of 2.5 percent (rounded up from 2.4921 percent) is the average TS SW access rate change across originating non-toll free end office rates and all non-toll free transport rate elements.

NECA proposes to increase TS SP access service rates by an average across all services of 16.2 percent⁴⁶ (16.9 percent after the billing cycle adjustment).⁴⁷ Before billing cycle effects, NECA proposes an average rate increase of 10.7 percent for Ethernet Transport Service (ETS), an average rate increase of 12.6 percent for A/SDSL Voice-Data rates, an average rate increase of 10.5 percent for the DSL Broadband-only rate which recovers the cost of second mile transport, and an average rate increase of 23.4 percent for non-DSL SP access services excluding ETS. Proposed SP access NRCs will increase by the respective average rate change of the service they are associated with. For those NRCs not tied to any particular service, the overall average rate change will be applied. The FUSC surcharge factor is set equal to the Commission's Third Quarter USF Contribution Factor.⁴⁸

⁴⁶ This is a weighted average rate change that accounts for tariff rate changes and rate band movement. Rates charged by individual study areas will depend on their rate band placement.

⁴⁷ A billing cycle adjustment is included in the special access rate setting process to account for one-half month of revenues billed at current rates. The billing cycle is estimated to be approximately one twenty-fourth of the proposed test period revenue change.

⁴⁸ See *Proposed Third Quarter 2024 Universal Service Contribution Factor*, Public Notice, CC Docket No. 96-45, DA 24-557 (rel. June 12, 2024) (*Third Quarter 2024 USCF Public Notice*).

Table 4
Summary of Rate Changes from Current Rates

Element	Current Rates	Proposed Rates	Percent Change
TS SW Originating LS – Premium, Non-Toll free, Rate Band 1	\$0.014640	\$0.015005	2.5%
TS Special Access: ⁴⁹			
• DS1 High Capacity Chan Term	\$797.04	\$983.28	23.4%
• ETS 100 Mbps Chan Term (300+ft)	\$368.93	\$408.43	10.7%
DSL WPP 3-Year ADSL Voice-Data			
• 6 Mbps/1 Mbps	\$28.29	\$31.86	12.6%
• 100 Mbps/50 Mbps	\$54.71	\$61.61	12.6%

⁴⁹ The DS1 High Capacity and ADSL Voice-Data current rates are band 24 rates. The ETS 100 Mbps current rates are band 26 rates. The proposed rates are not actual tariff rates but are designed to illustrate the average rate change. Some ECs will have a rate increase while others will have a rate decrease. Rates charged by individual study areas will depend on their rate band placement. For more information, please refer to Volume 5 of this filing.

Volume 1

DESCRIPTION AND JUSTIFICATION

Section 2

DESCRIPTION OF STUDIES

NECA conducted several studies to develop cost support and demand information supporting the development of rates, including calculation of ARC rates and estimated CAF ICC payments. A description of the demand data collection supporting the calculation of ARC rates and estimated CAF ICC support is contained in Volume 5 of this filing. NECA also performed studies to develop 2023 PYCOS data and to project costs of providing interstate CL and TS SP access service for the 2024/2025 test period. Studies were also used to allocate projected costs to access rate elements. In addition, access demand quantities and revenues were forecasted for the test period. Data underlying these studies were obtained from LECs through NECA initiated data requests, as well as from reports submitted in conjunction with NECA's monthly settlement process. Form 508 data filed with USAC on March 29, 2024 was used in conjunction with subsequent exchange carrier updates in the development of CBOL rates, as described in Volume 4.

Cost companies participating in at least one of NECA's CL or TS pools conduct operations in 555 study areas, geographically dispersed throughout the country. Average schedule companies participating in at least one of NECA's pools provide service in 247 study areas. Companies opting to receive model-based support (referred to herein as "model" companies or study areas) were required to exit the CL pool, but have the option of listing their

CL rate elements in the NECA tariff. Exhibit 2 displays the proportion of cost and average schedule pooling companies' share of projected CL and TS revenue requirements.

A. PROJECTED REVENUE REQUIREMENT FORECAST

NECA's aggregate PYCOS and test period cost company revenue requirement projections are based on a combination of historical pool cost study trends, monthly settlement data,⁵⁰ and company-specific forecast data for 2023, 2024 and 2025 provided by the companies.⁵¹ Combined use of historical cost trends, individual company budget data and statistical techniques have improved the accuracy of cost company PYCOS and test period forecasts. Cost separations studies for calendar year 2023 are not yet available from these companies.⁵²

NECA continues to use independent projection techniques to evaluate the reasonability of forecast data submitted by companies. Results of the independent forecast process have enabled NECA to determine whether adjustments to aggregated company-supplied projections should be applied.

Specifically, NECA applied weighted moving average trends to SP access costs to assess the change in SP access revenue requirement growth over time. In its trend analyses, NECA used a consistent set of cost company historical data from 2020 through 2022 for those companies participating in the NECA TS pool for the 2024/2025 test period. After extensive

⁵⁰ Each study area that settles on a cost basis reports, through the pooling process, five categories of costs for each pool in which it participates: (1) expenses and other taxes; (2) average net investment; (3) income adjustments for Federal Income Tax (FIT); (4) amortization of investment tax credits; and, (5) allowance for funds used during construction. All study areas report earned access revenues.

⁵¹ Cost data requested from companies are described in Volume 2 of this filing.

⁵² All cost companies in NECA's CL and TS pools conduct annual cost studies; none of the cost companies perform quarterly or monthly studies.

review of projected data, including historical pool cost trends and results of weighted moving average trend models, NECA developed PYCOS and test period cost data forecasts for all cost companies at the level of detail specified in the *2024 TRP Order*.⁵³ The development of cost company revenue requirements is described further in Volume 2.

Average schedule companies do not perform cost studies.⁵⁴ The average schedule CL formula and CBOL formula produce settlement dollar amounts per access line and CBOL line respectively that vary based on total lines (access lines plus CBOL lines) per exchange. In addition, part of the average schedule company CL revenue requirement is based on frozen line port and CL Transport Interconnection Charge (TIC) shift components. For TS, there are settlement formulas for SP access (DSL voice-data, non-DSL and second mile transport). Switched access settlements (central office switching, intertoll dial switching, line haul facility, line haul termination, equal access and SS7) are frozen at the 2011/2012 test period level with a 5% yearly phasedown as prescribed in the *USF/ICC Transformation Order*.⁵⁵

PYCOS data for average schedule companies were produced by adjusting historical 2023 monthly settlements to reflect formulas that became effective July 1, 2023, and changes expected to result from true-ups of pool reports.⁵⁶ These latter adjustments were developed using historical trends of pool true-up impacts. Projected test period revenue requirements for average

⁵³ See *July 1, 2024 Annual Access Charge Tariff Filings*, WC Docket No. 24-41, Order, DA 24-434 (rel. May 10, 2024) (*2024 TRP Order*).

⁵⁴ See 47 C.F.R. § 69.606. See also *2024 Modification of Average Schedules*.

⁵⁵ See *National Exchange Carrier Association, Inc. 2011 Modification of Average Schedules*, WC Docket No. 10-251, *National Exchange Carrier Association, Inc. 2012 Modification of Average Schedules*, WC Docket No. 11-204, Order, 27 FCC Rcd. 6209 (2012).

⁵⁶ For consistency, the schedules that were effective July 1, 2023 were used to calculate the entire PYCOS period for average schedule companies.

schedule companies are based upon the average schedule formulas underlying the *2024 Modification of Average Schedules*, settlement impacts resulting from the *MAG Order*, and projected demand for access services for the test period.

Volume 2 describes the development of projected revenue requirements included in this filing. The results are also included in NECA's TRP in Volume 1-2. A summary of projected revenue requirements is displayed in Exhibit 2.

B. NECA EXPENSE RECOVERY

Commission rules require NECA to allocate its Category I expenses among three sub-categories.⁵⁷ Category I expenses are those associated with the preparation and administration of NECA tariffs, the administration of pooled receipts and distributions of exchange carrier revenues resulting from NECA tariffs, and NECA's participation in Commission proceedings involving Subpart G of Part 69 of Commission rules. These expenses are divided between NECA's CL (including CBOL) and TS pool revenue requirements in proportion to the revenues associated with each.⁵⁸ TS pool revenue requirements include ARC revenues and CAF ICC support revenues.⁵⁹

Volume 2, Section 3.A.4 describes the allocation of NECA Category I expenses.

C. PROJECTED DEMAND QUANTITIES

NECA used time series techniques to forecast interstate demand and revenue for its CL and TS pool participants. Historical data used for modeling were adjusted if necessary to reflect

⁵⁷ See 47 C.F.R. § 69.603(g).

⁵⁸ *Id.*

⁵⁹ *Id.*; 47 C.F.R. § 69.603 (h)(3).

expected data revisions reported to the pool. These adjustments were developed using historical trends of pool true-up effects. To validate its forecasts, NECA relied on a series of statistical tests. These tests are discussed in Volume 3.

To forecast test period CL access lines and end user revenues, NECA used an Unobserved Component Model (UCM) applied to NECA CL pool members' line count data history. The development of access lines demand projections is described further in Volume 3.B. Service category projections were based on actual December 2023 and projected December 2024 and December 2025 service category line count data submitted to NECA's Annual Forecast Line Count Data Collection by CL pool members. Annual Forecast Line Count Data Collection is described further in Volume 3, Appendix A. In addition, the source of the projected CBOL line demand is described in Volume 3.C.

Test period projections for intrastate minutes of use (MOU) are companies' projections gathered from NECA's CAF ICC Data Collection. To forecast interstate Local Switching (LS) MOU demand, NECA used the Autoregressive Integrated Moving Average (ARIMA) and UCM techniques discussed further in Volume 3.D. Test period projections for interstate LS MOU are based on NECA's forecasts, except for companies choosing to input their own forecasts into NECA's CAF ICC Data Collection. NECA's CAF ICC Data Collection is described further in Volume 3, Appendix B.

NECA's TS SP access demand forecasts are a composite of projections by NECA and pool members and take into account the demand effects of study areas entering or exiting NECA's SP access and DSL tariffs. NECA forecasted total SP access revenues using time series techniques (ARIMA) and individual study area SP access revenue using the UCM method for the Non-DSL Non-ETS, voice-data DSL, and ETS service categories. NECA then used sample

billing data and Advanced Services Demand Data Request data to develop SP access rate element forecasts. The development of SP access demand projections is described further in Volume 3.

Volume 1

DESCRIPTION AND JUSTIFICATION

Section 3

RATE DEVELOPMENT OVERVIEW

This section describes the CL, CBOL and TS rate development processes used by NECA for this filing. The development of CL rates described below does not apply to companies electing model-based support, Alaska Plan support, or RoR carriers affiliated with Consolidated Communications, Inc.⁶⁰

A. COMMON LINE RATE DEVELOPMENT

The CL revenue requirement consists of the base factor portion (BFP)⁶¹ and universal service contributions.⁶² This revenue requirement is recovered through end user SLCs, Integrated Services Digital Network (ISDN) Port charges, DS1 Channel Service Port charges, the SAS, the FUSC, and the CAF BLS Voice universal service mechanism. SLC charges, ISDN line port charges, DS1 line port charges, and SAS are billed to LEC end users. NECA pool members receive CAF BLS Voice from the federal universal service program as described in Volume 2.

⁶⁰ 2016 USF RoR Reform Order ¶¶ 21, 195.

⁶¹ See 47 C.F.R. § 69.501(f).

⁶² For RoR carriers, universal service contributions are included in the common line revenue requirement but are recovered through a separate end user charge. See *Federal-State Joint Board on Universal Service*, Report and Order, 12 FCC Rcd. 8776 (1997) ¶ 830. See also 47 C.F.R. § 69.131.

FUSC is a surcharge applied to interstate retail service revenue, including all CL end user revenue, special access retail revenue,⁶³ and ARC revenue.

1. Subscriber Line Charges (SLCs)

Sections 69.104 (n), (o), and (p) of Commission rules describe the End User Common Line (EUCL) rate levels for RoR LECs.⁶⁴ While EUCL is the term used in Commission rules, Subscriber Line Charge (SLC) may be more commonly used in the industry and the terms are used interchangeably herein.

To determine the number of applicable SLCs for those pooling LECs participating in NECA's end user tariff, NECA divided one-twelfth of each study area's projected test period CL revenue requirement by its projected average number of local exchange service subscriber lines for the 2024/2025 test period. For the 2024/2025 test period the cost per loop (CPL) for all study areas exceeds \$9.20, therefore all study areas are assigned to the highest rate band group. Since the CPL for all study areas exceeds the capped rate, all pooling study areas will charge the \$9.20 MLB capped rate and the \$6.50 residence and single line business capped rate. The development of SLC rates is discussed in further detail in Volume 4 Section 2.

2. Federal Universal Service Charge (FUSC)

NECA pool members recover their universal service contributions via explicit end user surcharges.⁶⁵ These end user surcharges apply to interstate retail revenues including end user CL

⁶³ In response to the *2018 USF Forbearance Order*, companies no longer charge NECA's FUSC Surcharge Factor on ADSL, SDSL and CBOL charges if the company has chosen to cease its USF contributions on these services pursuant to the relief granted in the order.

⁶⁴ See 47 C.F.R. § 69.104(n), (o) and (p).

⁶⁵ See 47 C.F.R. § 69.131.

and retail special access revenues.⁶⁶ For purposes of calculating these surcharges NECA has assumed that billed ARC revenues are interstate revenues subject to FUSC. In this filing, all CL pool members have opted to forbear from assessing FUSC on the services addressed in the *2018 USF Forbearance Order*.

For the 2024/2025 test period, the FUSC surcharge factor is set as a percent of interstate retail revenue. The FUSC surcharge factor is 34.4 percent, which is the Commission's proposed third quarter 2024 universal service contribution factor.⁶⁷ This charge is applied to CL, special access retail, and ARC revenues for all companies listed in Section 17.7 (A) of NECA Tariff F.C.C. No. 5. Companies that elected optional rate banding for their MLB EUCL FUSCs are listed in Section 17.7 (B). Section 17.7 (C) of NECA Tariff F.C.C. No. 5 is used to list any companies opting not to forbear from charging the FUSC Surcharge Factor on ADSL, SDSL and CBOL revenues. All study areas in NECA Tariff F.C.C. No. 5 for the 2024/2025 test period are opting to forbear. Optional MLB EUCL FUSC rate bands are discussed in further detail in Volume 4, and are displayed in Volume 4, Exhibit 6. Volume 4, Exhibit 7 shows projected test period FUSC revenue of \$30.1M.

B. CONSUMER BROADBAND-ONLY LOOP (CBOL) RATE DEVELOPMENT

For companies participating in NECA's DSL tariff, CBOL costs were removed from the TS SP access category. The amount of CBOL costs removed from the TS SP access category totals \$403.8M for the rate of return companies with broadband-only loop demand that currently participate in NECA's DSL tariff, as discussed in Volume 2 Section 3.A.1.

⁶⁶ Companies may forbear from charging FUSC on ADSL, SDSL and CBOL charges. *See 2018 USF Forbearance Order*.

⁶⁷ *See Third Quarter 2024 USCF Public Notice*.

For cost companies, CBOL revenue requirements were developed consistent with Part 36 and Part 69 cost allocation rules, as directed in the *February 16, 2018 Order*.⁶⁸ For average schedule companies, the CBOL revenue requirement is based on approved average schedule formulas.⁶⁹

The CBOL revenue requirement is recovered through a company-specific CBOL charge and the CAF BLS Broadband-only universal service mechanism. The CBOL revenue requirements discussed in detail in Volume 2 and CBOL demand described in Volume 3 were used to develop company-specific CBOL rates, as described in Volume 4.

Volume 4 also describes the development of projected end user revenues for the CL pool as well as the development of CBOL revenue projections. Test period end user revenue is displayed in Volume 4, Exhibit 2. Total proposed test period CBOL revenue including CAF BLS Broadband-only support with the estimated effect of the BCM is shown on Volume 4, Exhibit 5, Line 8. Total test period proposed CL revenue including CBOL revenue and CAF BLS with the estimated effect of the BCM is \$1.329B and is shown in Volume 4, Exhibit 5, Line 9.

C. TRAFFIC SENSITIVE RATE DEVELOPMENT

Special access rates are developed to recover the revenue requirements described in Volume 2 using demand described in Volume 3. Development of TS rates is discussed in detail in Volume 5. Exhibit 4 of this Volume displays TS demand and revenues for the test period.

TS switched access contains the following access elements: LS, information surcharge, and local transport.⁷⁰ In compliance with the *USF/ICC Transformation Order*, switched access

⁶⁸ See *February 16, 2018 Order* ¶ 9. See also 47 C.F.R. § 69.311 and § 69.416.

⁶⁹ See *2024 Modification of Average Schedules*.

⁷⁰ See 47 C.F.R. §§ 69.106, 69.109, and 69.301(a).

rates are capped. A subsequent rule requires NECA to adjust SW rates when companies enter or exit the TS pool.⁷¹ There are two study areas entering and fifty study areas exiting the NECA TS SW access portion of the TS pool for the upcoming test period. The effect of these pool participation changes on the upcoming test period's SW access rates is an increase of 2.4921 percent.

Commission rules prescribe the calculation of interstate SW access rates for exiting carriers.⁷² The required SW access rate changes for each exiting or entering carrier, along with calculated pool exit or entry effects on SP access rate changes for each applicable carrier, are displayed in NECA's TRP on the SW Access Rate Effects and SP Access Rate Effects tabs.

The originating toll-free rates specified in the *8YY Access Charge Reform Order* are unchanged from the current rates that became effective on July 1, 2023.⁷³

NECA used interstate and intrastate rates and associated demand projections, along with revenue and exogenous cost true-ups and any double recovery adjustments, to compute each company's Eligible Recovery, ARC rates, and estimated CAF ICC support amounts, as described in Volume 5.

1. Local switching and information surcharge

The SW access local switching rate element was designed to recover costs associated with central office equipment (COE) Category 3 investment and related expenses.⁷⁴ The LS rate is charged on a per-access MOU basis.

⁷¹ See 47 C.F.R. § 51.909(a)(4).

⁷² See 47 C.F.R. § 51.909(a)(5).

⁷³ See *2023 Annual Access Tariff Filing*, Volume 5, Section 4.B.

⁷⁴ See 47 C.F.R. § 69.106.

The originating information surcharge rate and the originating LS rate remain separate in this filing as in prior filings. NECA's LS rates are composed of eight rate bands. The proposed rate band assignments are capped per the *USF/ICC Transformation Order*, as described in Volume 5.

2. Local transport

Local transport rate elements consist of four main categories:

- Direct trunked transport
- Tandem switched transport
- Dedicated signaling transport
- Entrance facilities

Direct trunked transport rate elements recover a portion of the costs between the customer's serving wire center and telephone company end offices or access tandems. Direct trunked transport facilities are dedicated to the use of a single customer and are ordered by the customer as either: Voice Grade, High Capacity DS1, High Capacity DS3, Synchronous Optical Channel OC3, or Synchronous Optical Channel OC12. Direct trunked transport is flat-rated.

Tandem switched transport rate elements recover a portion of the costs between a customer's serving wire center and an end office, or between a tandem switch and an end office, including the tandem switch. Tandem switched transport for non-toll free traffic is charged on a per MOU basis for each termination, facility mile, and usage of the tandem switch. Tandem switched transport for toll-free traffic between the originating end office and the tandem switch is charged on a per MOU basis via the Joint Tandem Switched Transport rate.

Entrance facilities charges recover a portion of the costs for the dedicated communications path between the customer's designated serving wire center and the customer's

premises. Entrance facilities are flat-rated and ordered by customers as either: Voice Grade, High Capacity DS1, High Capacity DS3, Synchronous Optical Channel OC3, or Synchronous Optical Channel OC12.

Local transport rate band assignments were capped as described in Volume 5. There continue to be eleven dedicated transport rate bands, as originally proposed in the *2011 Annual Access Tariff Filing*.

3. Summary of SW Access Revenue

Exhibit 4, Workpaper 1 of this Volume summarizes and displays SW access revenue requirement and expected interstate and intrastate revenues for the 2024/2025 test period. The information on this exhibit includes ARC revenue and CAF ICC revenue, along with the true-up effects of the 2022/2023 test period.⁷⁵

4. Special Access Rate Development

NECA proposes to increase TS SP access service rates by an average of 16.2 percent (16.9 percent after the billing cycle adjustment).⁷⁶ However, proposed rate changes for individual SP access services vary. As of January 2017, A/SDSL broadband-only rates recover second mile transport costs.

The number of SP access DSL, non-DSL and ETS rate bands remains at fifty as originally established in the *2015 Annual Access Tariff Filing*. The DSL voice-data rate bands apply to DSL voice-data recurring rate elements. The DSL broadband-only rate bands apply to

⁷⁵ See 47 C.F.R. § 51.917.

⁷⁶ A billing cycle adjustment is included in the special access rate setting process to account for one-half month of revenues billed at current rates. The billing cycle is estimated to be approximately one twenty-fourth of the proposed test period revenue change. Rates charged by individual study areas depend on their rate band placement. See Volume 5 of this filing.

DSL broadband-only recurring rate elements. The calculation of SP access rates is described in detail in Volume 5, Section 3. Volume 1, Exhibit 4, Workpapers 2 through 5 display all SP access demand and revenue for the 2024/2025 test period.

Volume 1

DESCRIPTION AND JUSTIFICATION

Section 4

TRAFFIC SENSITIVE EARNINGS AND ATTRIBUTION ANALYSIS

This section provides an overview of NECA's earnings and attribution analysis and is divided into three parts:

1. A SP access attribution analysis that summarizes adjustments made to base year reported pool results (in this case calendar year 2023) to develop test period forecasts and proposed rates.
2. Three views of 2023 SP access earnings: an initial view that corresponds to the March 2024 Form 492 Report, an intermediate view, and a most recent projected view.
3. A scorecard comparing filed forecasts for SP access demand and revenue requirement growth to latest view of actual.

Attribution and earnings analyses were not performed for SW access since SW access rates have been capped and revenue requirements have been frozen at levels underlying the *2011 Annual Access Tariff Filing* reduced by 5 percent a year based on the *USF/ICC Transformation Order*.

A. ATTRIBUTION ANALYSIS

The attribution analysis explains how proposed SP access rates relate to current pool earnings levels. Table 5 below displays the adjustments made to the March 2024 view of 2023 reported data to derive the 2023 projected levels defined as PYCOS. The resulting PYCOS data assumes the 2024/2025 test period pool composition, average schedule formulas in effect for the

2023/2024 test period, rates in effect for the 2023/2024 test period, and a 9.75 percent RoR. By making these adjustments, PYCOS and test period data become comparable. To develop PYCOS, three basic types of adjustments are made to reported SP access data: (1) projection adjustments; (2) average schedule to cost company conversions; and (3) pool participation changes during the upcoming test period.

Table 5
PYCOS ANALYSIS FOR 2023
SPECIAL ACCESS (in millions)

	2023 Pool Reported as of March 2024	Projection Adjustments	Conversions to Cost	Exit & Entrant Effects	2023 PYCOS at 9.75% RoR
Revenues	\$252.893	\$1.535	N/A	-\$29.464	\$224.964
Average Schedule (AS) Revenue Requirement	\$29.181	\$0.744	\$0.000	-\$1.700	\$28.224
Cost Company (CC) Revenue Requirement	\$223.955	-\$2.724	\$0.000	-\$24.946	\$196.285
NECA Expenses	\$8.338	-\$0.326	N/A	N/A	\$8.012

The first column entitled “2023 Pool Reported as of March 2024” displays actual data reported to NECA for calendar year 2023. The totals for the year are the summation of data reported monthly to NECA. Each month’s data depends on the rates in effect that month, the pool composition in that month and whether the company was a cost company or average schedule company in that month.

The first set of adjustments to actual data to produce PYCOS data are projection adjustments. Some of the projection adjustments are known effects, such as a rate change occurring on July 1, 2023. Because PYCOS must be priced-out at current rates, revenue levels in the months prior to the rate change must be adjusted to conform to the July effective rates. The revenue adjustment of \$1.535M is the net result of the 5.9 percent SP access rate increase in July 2023 applied to the first six months of the year, in addition to an adjustment as a result of the DSL pool changes and companies exiting the TS pool in July 2023. Another example of known changes are the average schedule formula changes that took effect in July 2023. Data for the first half of 2023 were adjusted to reflect the formulas in effect beginning in July 2023. Remaining projection adjustments are consistent with the latest cost and demand projections for the entire time span from January 2023 through June 2025. The cost company revenue requirement projection is based on the forecasting methodology described in Volume 2.

Consistency in pool composition is critical for the evaluation of growth rates linking PYCOS to the test period. Two types of pool composition adjustments were made to 2023 pool results: average schedule to cost conversions, and entries and exits from the pool effective July 2024. Average Schedule companies have the option to convert to cost. For those companies that chose to do so during 2023 or during the test period, NECA calculates the effect these conversions have on the entire 2023 calendar year. The column entitled “Conversions to Cost” shows a change of \$0.000 as there were no average schedule to cost conversions during this time. The next column shows the effect of pool elections for the upcoming test period. Exits reduce revenue and revenue requirements and entries increase them, resulting in the 2023 PYCOS reflecting the pool membership for the upcoming 2024/2025 test period.

Table 6 displays the derivation of the test period data at proposed rates. This is done in two steps: first, PYCOS data are grown to test period levels; and second, the test period revenue projection, which is priced out at current rates to compare to PYCOS revenue at current rates, is then restated at proposed rates to equal the projected revenue requirement. The projected revenue requirement reflects a 9.75 percent RoR as displayed in the last column, last row, of Table 6.

Table 6
MARCH 2024 VIEW OF SPECIAL ACCESS 2024/2025 PROJECTIONS
SPECIAL ACCESS RATE ANALYSIS (in millions)

	Mar 2024 View of 2023 Pooled Reported	2023 PYCOS (Revenue at Constant Rates *)	Annual Growth Rates For 24/25 Test Period	24/25 Test Period (Revenue at Constant Rates *)	24/25 Test Period (Revenue at June 2024 Banded Rates)	24/25 Test Period at Proposed Rates **
	A	B	C	$D = B * (1 + C)^{(3/2)}$	E	F
Total Revenue	\$252.893	\$224.964	-10.44%	\$190.669	\$192.071	\$223.229
AS RRQ	\$29.181	\$28.224	-5.80%	\$25.807	\$25.807	\$25.807
CC RRQ	\$223.955	\$196.285	-2.46%	\$189.091	\$189.091	\$189.091
NECA EXP	\$8.338	\$8.012	2.65%	\$8.332	\$8.332	\$8.332
Total RRQ	\$261.474	\$232.521	-2.68%	\$223.229	\$223.229	\$223.229
RoR	7.74%				2.61%	9.75%

* Constant rate is defined as unbanded June 2024 rate. The annual growth is defined for each category as $((\text{Test Period at Constant Rate} / \text{PYCOS})^{(2/3)}) - 1$.

** Rate adjustments include a 16.22% increase in revenue for the test period.

DERIVATION OF SPECIAL ACCESS PROPOSED RATE CHANGE

ROW 1	Total Test Period Revenue at June 2024 Rates and Bands	\$192.071
ROW 2	Total Test Period Revenue Requirement	\$223.229
ROW 3	Test Period Revenue Surplus (Deficit) at June 2024 Rates and Bands	(\$31.158)
ROW 4	% Special Access Rate Change (ROW 3 / ROW 1 * (-100))	16.22%
ROW 5	% Special Access Rate Change Adjusted for Billing Cycle Effect***	16.90%
ROW 6	Total Filed Billed Revenue (ROW 1 * (1 + ROW 4))	\$223.229

*** Row 5 adjusts test period revenue upward for the billing cycle effect in July.

B. THREE “FORM 492” REPORT VIEWS

Actual pool earnings results for 2023 change on a monthly basis as participating carriers submit true-up data. At the time of the March 28, 2024 Form 492 filing, the February 2024 view of pool earnings was reported to the Commission.⁷⁷ In this filing, NECA submits the March 2024 view of TS SP access pool earnings and NECA’s Projected View of 2023 TS SP access pool earnings.⁷⁸ The data is summarized in Table 7 below.

⁷⁷ See Letter from Stela Stefanova, Senior Director, NECA, to Marlene H. Dortch, FCC Secretary (filed Mar. 28, 2024), attaching FCC Form 492 reports.

⁷⁸ The “Projected View” is defined as NECA’s current best estimate of earnings that would be calculated as of the close of the twenty-four month true-up window.

Table 7
March Form 492 Report, March Pool Results and Final Projections for 2023
(in millions)

<u>Special Access</u>				
		March 492 Report*	March 2023 Pool Results	Final Projected Pool Results
1	Total Revenues	\$252.388	\$252.893	\$252.922
2	Total Expenses and Taxes	\$226.495	\$227.324	\$227.581
3	Oper. Inc. (Net Return) (Line 1 – Line 2)	\$25.893	\$25.569	\$25.341
4	Rate Base – (Avg. Net Investment)	\$329.047	\$330.354	\$324.059
5	Rate of Return Annualized	7.87%	7.74%	7.82%

*Based on February 2024 pool results. Form 492 reports for the companies participating in NECA's Traffic Sensitive pool during entire 2023.

C. SCORECARD

Comparing historical filed and trued-up forecasts provides an added source of information to judge the reasonableness of current growth projections. Summaries of filed versus actual demand and revenue requirements are shown below.

1. Demand Growth Comparisons: Filed to Actual for Access Lines, Switched MOU and Special Access Revenue

NECA bases its demand forecasts on historical data, and uses statistical forecasting methods weighting recent historical years more heavily than earlier ones. For a consistent sample of study areas, the table below compares filed forecasts with actual results for test periods 2021/2022 through 2024/2025.

A continued decline in NECA’s access lines, and growth in broadband-only lines, has occurred in recent years. The first chart in Table 8 labeled “Summary of Lines Growth” contains broadband-only lines in addition to access lines. The sum of access lines plus broadband-only lines displays slightly positive growth rates since the 2021/2022 test period. This year’s 2024/2025 test period projection of access lines plus broadband-only lines is 0.8 percent.

Table 8
Lines, Interstate MOU, and Special Access
Revenue Growth *

Summary of Lines Growth**

Test Period	Filed Lines Growth	Reported March 2024 Latest View Lines Growth
2021/2022	1.2%	1.1%
2022/2023	0.1%	1.0%
2023/2024	0.7%	0.7%
2024/2025	0.8%	N/A

Summary of Interstate MOU Growth

Test Period	Filed MOU Growth***	Reported March 2024 Latest View MOU Growth
2021/2022	-8.2%	-15.0%
2022/2023	-14.4%	-17.1%
2023/2024	-14.1%	-17.7%
2024/2025	-14.6%	N/A

Summary of Special Access Revenue Growth

Test Period	Filed Special Access Revenue Growth	Reported March 2024 Latest View Special Access Revenue Growth
2021/2022	-5.9%	-8.4%
2022/2023	-6.9%	-8.1%
2023/2024	-7.6%	-10.6%
2024/2025	-10.4%	N/A

* Growth rate reflects March 2024 projections used in the annual filing.

** Lines represent access lines and broadband-only lines.

*** Data based on the CAF ICC Data Collection

NECA's TS interstate minutes growth continues with a negative trend over past test periods. The 2024/2025 test period projection is -14.6 percent. Continued TS interstate minute declines overall reflect the continued migration of demand towards broadband, wireless, and VoIP services.

NECA's SP access revenue growth rate has become slightly more negative in recent test periods. The projected growth rate is -10.4 percent for test period 2024/2025. The SP access revenue decline reflects the migrations from DS1 or DS3 services to ETS, IXC's optimization of their networks, and the conversions of DSL voice-data to CBOL.

2. Revenue Requirement Growth Comparisons: Filed to Actual for Special Access

Cost company revenue requirement projections have been based on company projections as well as trending techniques explained in more detail in Volume 2. For average schedule companies, settlement projections are calculated based on the formulas underlying the *2024 Modification of Average Schedules* to take effect in July 2024, and the projected level of demand quantities for the test period. The total 2024/2025 projected SP access revenue requirement

growth rate continues to be negative, consistent with the growth of broadband-only loops. The projected growth rate is -2.9 percent as shown in the last section of Table 9. These projections are explained in more detail in Volume 2.

Table 9
Summary of Revenue Requirement Growth*

Cost Companies		
	Special Access	
Test Period	Filed Growth	Latest View Growth
2021/2022	-3.1%	-4.3%
2022/2023	-1.8%	-4.2%
2023/2024	-2.8%	-3.5%
2024/2025	-2.5%	N/A

Average Schedule Companies		
	Special Access	
Test Period	Filed Growth	Latest View Growth
2021/2022	-1.5%	-2.4%
2022/2023	-4.9%	-4.6%
2023/2024	-0.2%	-1.4%
2024/2025	-5.8%	N/A

Total Special Access Cost and Average Schedule Companies		
Test Period	Filed Growth	Latest View Growth
2021/2022	-2.9%	-4.1%
2022/2023	-2.2%	-4.3%
2023/2024	-2.5%	-3.2%
2024/2025	-2.9%	N/A

* March 2024 view (excludes NECA expenses)

D. SUMMARY

The attribution section gives a detailed account of NECA's SP access ratemaking methodology. In sequential order the tables:

1. describe adjustments used to derive PYCOS from 2023 reported financial data
2. summarize rate change calculations
3. display projected growth rates linking PYCOS to test period projections

The earnings section gives three views of NECA SP access pool earnings for 2023. It includes the February view filed with the Commission and two other views, the March view underlying NECA's rate development described in the attribution section and a latest projected view using the growth rates underlying the filing. The projected view offers a more representative view of 2023 earnings than the March report.

The scorecard section of this volume is a means for judging the adequacy of the growth rates used to develop test period revenue and revenue requirement projections. It shows proposed growth rates are reasonable.

Together, these sections show NECA's SP access rate changes are reasonable in light of historical data, and are targeted to earn the authorized RoR.