



T (209) 955-6100  
F (209) 955-6199

3121 W. March Lane  
Suite 200  
Stockton, CA 95219

June 13, 2018

State of Utah Public Service Commission

160 East 300 South

Salt Lake City, UT 84114

Re: Docket No. 18-999-12: Administration of Connect America Fund Inter-carrier Compensation Replacement §54.304(d)(1), Annual Reporting Requirements §54.313(h)(i), Transition of Carrier Access Charges §51.909, and Eligible Revenue Recovery § 57.917(d)(vii)

Moss Adams LLP respectfully files with the State of Utah Public Service Commission this Request for Confidential Treatment of Information (the "Request") on behalf of All West Communications-Utah. The Request seeks confidential treatment of information contained in the projected eligibility for CAF ICC funding for July 1, 2018 through June 30, 2019 and Local Rate Floor Data. This data collection is proprietary and confidential and subject to PSC R746-1-602 and 603.

Pursuant to 47 C.F.R. §54.304(d)(1) of the Federal Communications Commission's rules, enclosed please find the projected eligibility for CAF ICC funding for July 1, 2018 through June 30, 2019 for All West Communications-Utah, Study Area Code 502288. This projection includes any true-ups associated with earlier filing periods. This projection has also been filed with the Federal Communications Commission and



the Universal Service Administrative Company, as the administrator of the Federal Universal Service Fund.

In addition, All West Communications-Utah includes its Local Rate Floor Data certifications and associated reporting as required in 47 C.F.R. §54.313 (h)(i). As previously filed in accordance with 47 C.F.R. §51.909 governing Carrier Access Charges; All West Communications-Utah provides supplemental TRP data. Lastly copies of annual certifications regarding CAF ICC Data reported to the Federal Communications Commission specifically required for Double Recovery as specified in 47 C.F.R. §57.917 (d)(vii) are included with this filing.

Following this electronic redacted filing will be a confidential version uploaded to the STFP server. The pages with confidential data will have the following stamp on them: "CONFIDENTIAL - - SUBJECT TO UTAH PUBLIC SERVICE COMMISSION RULES R746-1-602 and 603". This information stamped confidential can be reviewed by the Commission staff.



MOSSADAMS

Should you have any questions regarding this filing, please contact me.

Sincerely,

**Tym Rutkowski**

Senior Manager

(509) 777-0137

[tym.rutkowski@mossadams.com](mailto:tym.rutkowski@mossadams.com)

Enclosures

cc: Ms. Anna Middleton (Via Email)



2018 CAF ICC Data Collection

NECA Home NECA Data Collections Contact Us CAF ICC - Instructions & Documents NECA IR - Paper Certification Tracking Logout

Logged in User: Samantha Simatos



Home Select Company Main Page Study Area Data Input Menu > CAF & ARC Output > Historic Reports > E-Certification >

Study Area: ALL WEST COMMUNICATIONS-UT (ID: 502288)

Intrastate Revenues (FCC TRP exhibit)

Option 1: View TRP Output in Excel

Option 2: Download TRP Data in Excel

Intrastate Revenues

Test Year 2018-2019 Expected Maximum Intrastate Revenue: [REDACTED]

Col D --	Col E --	Col F --	Col G --	Col H --	Col I --	Col J -- H*I	Col K --	Col L --	Col M -- [[L/K]^ (12/21)-1] *100	Col N -- H*L
Rate Element Description	Unit of Demand	7/1/2018 Interstate Rate	Test Year 2017-2018 Current Intrastate Rate	7/1/2018 Proposed Intrastate Rate	FY 2011 Intrastate Units: Terminating for Non-Dedicated or Originating and Terminating for Dedicated Elements	Intrastate Price-out with 7/1/2018 proposed intrastate rate and FY2011 Demand	FY 2017 Intrastate Units: Terminating for Non-Dedicated and total for Dedicated Elements	Test Year 2018-2019 Forecasted Intrastate Units	Intrastate Units Growth Rate %	TY 2018-19 Forecasted Intrastate Revenue
Terminating End Office Access Service Terminating End Office, Premium, per access minute	MOU									
Terminating End Office Access Service Terminating End Office, Non-Premium, per access minute	MOU									
Entrance Facility, Per Termination Voice Grade Two Wire	Termination									
Entrance Facility, Per Termination Voice Grade Four Wire	Termination									
Entrance Facility, Per Termination High Capacity DS1	Termination									
Entrance Facility, Per Termination High Capacity DS3	Termination									
Entrance Facility, Per Termination Synchronous Optical Channel OC3	Termination									
Entrance Facility, Per Termination Synchronous Optical Channel OC12	Termination									
Entrance Facility, Per Termination ESALT 2 Mbps	Circuit									
Entrance Facility, Per Termination ESALT 10 Mbps	Circuit									
Entrance Facility, Per Termination ESALT 50 Mbps	Circuit									
Direct Trunked Transport Facility/ Mile Voice Grade - Two Wire & Four Wire	Mile									
Direct Trunked Transport Facility/ Mile High Capacity DS1	Mile									
Direct Trunked Transport Facility/ Mile High Capacity DS3	Mile									
Direct Trunked Transport Facility/ Mile Synchronous Optical Channel OC3	Mile									
Direct Trunked Transport Facility/ Mile Synchronous Optical Channel OC12	Mile									
Direct Trunked Transport Facility/ Mile ESALT 2 Mbps DTF-E1	Circuit Miles									
Direct Trunked Transport Facility/ Mile ESALT 2 Mbps DTF-E2	Circuit Miles									
Direct Trunked Transport Facility/ Mile ESALT 2 Mbps DTF-E3	Circuit Miles									
Direct Trunked Transport Facility/ Mile ESALT 2 Mbps DTF-E4	Circuit Miles									
Direct Trunked Transport Facility/ Mile ESALT 10 Mbps DTF-E1	Circuit Miles									

Direct Trunked Transport Facility/ Mile ESALT 10 Mbps DTF-E2	Circuit Miles	
Direct Trunked Transport Facility/ Mile ESALT 10 Mbps DTF-E3	Circuit Miles	
Direct Trunked Transport Facility/ Mile ESALT 10 Mbps DTF-E4	Circuit Miles	
Direct Trunked Transport Facility/ Mile ESALT 50 Mbps DTF-E1	Circuit Miles	
Direct Trunked Transport Facility/ Mile ESALT 50 Mbps DTF-E2	Circuit Miles	
Direct Trunked Transport Facility/ Mile ESALT 50 Mbps DTF-E3	Circuit Miles	
Direct Trunked Transport Facility/ Mile ESALT 50 Mbps DTF-E4	Circuit Miles	
Direct Trunked Transport Facility/Termination Voice Grade - Two Wire & Four Wire	Termination	
Direct Trunked Transport Facility/Termination High Capacity DS1	Termination	
Direct Trunked Transport Facility/Termination High Capacity DS3	Termination	
Direct Trunked Transport Facility/Termination Synchronous Optical Channel OC3	Termination	
Direct Trunked Transport Facility/Termination Synchronous Optical Channel OC12	Termination	
Direct Trunked Transport Facility/Termination ESALT 2 Mbps	Circuit terms	
Direct Trunked Transport Facility/Termination ESALT 10 Mbps	Circuit terms	
Direct Trunked Transport Facility/Termination ESALT 50 Mbps	Circuit terms	
Multiplexing, Per Arrangement DS3 to DS1	Termination	
Multiplexing, Per Arrangement DS1 to Voice	Termination	
Customer Node Per Node OC3 155.52 Mbps	Port	
Customer Node Per Node OC12 622.08 Mbps	Port	
Customer Premises Port, Per Port OC3 155.52 Mbps	Port	
Customer Premises Port, Per Port STS-1 51.84 Mbps	Port	
Customer Premises Port, Per Port DS3 44.736 Mbps	Port	
Customer Premises Port, Per Port DS1 1.544 Mbps	Port	
Add/Drop Multiplexing Central Office Port, Per Port DS1 1.544 Mbps	Port	
Add/Drop Multiplexing Central Office Port, Per Port OC3 155.52 Mbps	Port	
Add/Drop Multiplexing Central Office Port, Per Port DS3 44.736 Mbps	Port	
Network Blocking, Per Blocked Call Network Blocking, Per Blocked Call, Applies to FGD only	Call	
ESALT Real Time CoS/QoS, Per ESALT DTF-E1 Facility ESALT 2 Mbps	Facility	
ESALT Real Time CoS/QoS, Per ESALT DTF-E1 Facility ESALT 10 Mbps	Facility	
ESALT Real Time CoS/QoS, Per ESALT DTF-E1 Facility ESALT 50 Mbps	Facility	
ESALT Entrance Facility Protection, Per ESALT Entrance	Circuit	

Facility ESALT 2 Mbps		
ESALT Entrance Facility Protection, Per ESALT Entrance Facility ESALT 10 Mbps	Circuit	
ESALT Entrance Facility Protection, Per ESALT Entrance Facility ESALT 50 Mbps	Circuit	
Common Channel Signaling Network Connection Signaling Mileage Facility, Per Mile	Mile	
Common Channel Signaling Network Connection Signaling Mileage Termination, Per Termination	Termination	
Common Channel Signaling Network Connection Signaling Entrance Facility, Per Facility	Facility	
Common Channel Signaling Network Connection STP Port, Per Port	Port	
Terminating Tandem Switched Transport Terminating Tandem Switched Transport Facility	Minutes / Mile	
Terminating Tandem Switched Transport Terminating Tandem Switched Termination	Minutes	
Terminating Tandem Switched Transport Terminating Tandem Switching	Minutes	
Nonrecurring Charges Voice Grade Two Wire	Facility	
Nonrecurring Charges Voice Grade Four Wire	Facility	
Nonrecurring Charges High Capacity DS1	Facility	
Nonrecurring Charges High Capacity DS3	Facility	
Nonrecurring Charges Synchronous Optical Channel OC3	Facility	
Nonrecurring Charges Synchronous Optical Channel OC12	Facility	
Nonrecurring Charges Interim NXX Translation, Per Order	Order	
Nonrecurring Charges FGC and FGD Conversion of Multifrequency Address Signaling to SS7 Signaling or SS7 Signaling to Multifrequency Address Signaling, per 24 trunks converted or fraction thereof on a per order basis	Order	
Nonrecurring Charges Trunk Activation, per 24 trunks activated or fraction thereof on a per order basis	Order	
Nonrecurring Charges Flexible Automatic Number Identification (Flex ANI), per End Office, per CIC	End Office	
Nonrecurring Charges ESALT 2 Mbps	Facility	
Nonrecurring Charges ESALT 10 Mbps	Facility	
Nonrecurring Charges ESALT 50 Mbps	Facility	
Nonrecurring Charges ESALT Direct Trunked Termination, per ESALT Direct Trunked Termination installed	Order	
Nonrecurring Charges ESALT Entrance Facility Protection, per ESALT Entrance Facility	Facility	



[Print this page]

## Study Area: ALL WEST COMMUNICATIONS-UT (ID: 502288)

### CONNECT AMERICA FUND

[Data to be provided to USAC/FCC in June 2018 for CAF ICC Purposes]

**Settlement Type: Cost**

**Test Period 7/1/18-6/30/19 Post True-up (Filing)**

**View**

<b>Rate-of-Return (ROR) Carrier Revenue Requirement</b>	
1	2011 Interstate Switched Access Revenue Requirement
2	FY 2011 Intrastate Terminating Switched Access Revenues
3	FY 2011 Net Reciprocal Compensation Revenues
4	2011 ROR Carrier Base Period Revenue (Line 1 + Line 2 + Line 3)
5	ROR Carrier Baseline Adjustment Factor (0.95 ^ 7)
6	ROR Carrier Revenue Requirement (Line 4 x Line 5)
7	Pool Administration Expenses
8	Total ROR Carrier Revenue Requirement (Line 6 + Line 7)
<b>Revenues from Reformed Inter-carrier Compensation (ICC) Rates</b>	
9	Interstate Switched Access Revenues
10	Interstate Allocated Switched Access Revenues#
11	Transitional Intrastate Access Service Revenues
12	Net Transitional Reciprocal Compensation Revenues
13	Total ICC Revenue (Line 10 + Line 11 + Line 12)
<b>Eligible Recovery</b>	
14	TRS Increment
15	Regulatory Fees Increment
16	NANPA Increment
17	Interstate Local Switching Support for Price Cap Affiliates or Estimated Duplicate LSS Costs in CAF II
18	Adjustment for Double Recovery or Corrections
19	Test Period 16/17 Trueup - Net Impact on Total Eligible Recovery
20	Eligible Recovery (Line 8 - Line 13) + (Line 14 + Line 15 + Line 16 + Line 18 + Line 19) - (Line 17)
<b>Revenues from Access Recovery Charges (ARC)</b>	
21	Residential ARC Revenues
22	Single Line Business ARC Revenues
23	Multi-Line Business ARC Revenues
24	Total ARC Revenues (Line 21 + Line 22 + Line 23)
<b>Connect America Fund (CAF) ICC Support**</b>	
25	Connect America Fund (CAF) ICC Support (Line 20 - Line 24)
<b>Revised CAF ICC Support with Imputed ARC Revenues for Broadband-Only L</b>	

26 ARC Revenue Adjustment following "Second Order on Reconsideration  
& Clarification" FCC 18-13

---

27 **Adjusted Test Period 2018-2019 CAFICC Support (Line 25 -  
Line 26)**

NOTES:

#Per FCC Designation Order, calculated as (Sum of Line 9 for all TS pool participants) \* (Line 1/ Sum of Line 1 for all TS pool participants)

\*\*NECA estimate provided for informational purposes only - actual to be calculated by USAC.





2018 CAF ICC Data Collection

NECA Home NECA Data Collections Contact Us CAF ICC - Instructions & Documents NECA IR - Paper Certification Tracking Logout

Logged in User: Samantha Simatos



Home Select Company Main Page Study Area Data Input Menu > CAF & ARC Output > Historic Reports > E-Certification >

Study Area: ALL WEST COMMUNICATIONS-UT (ID: 502288)

Access Recovery Charges

Recalculate ARC Rates & CAF Support revenues

Test Period 2018-19 Pre-True-up View Test Period 2018-19 Post-True-Up (Filing) View

Test Period 2018-2019 Post True-Up (Filing) View

Exchange/Zone Name	Residential Lines excluding Lifelines	Residential ARC	Residential ARC Revenue	SLB Lines	SLB ARC	SLB ARC Revenue	MLB Lines	MLB ARC	MLB ARC Revenue	Total ARC Revenue
Coalville										
Deer Mountain										
Jordanelle										
Kamas										
Randolph										
Timberlakes										
<b>Study Area Summary</b>										

TO BE COMPLETED BY THE REPORTING CARRIER.

**Certification of Officer as to the Accuracy of the CAF ICC Data Reported**

I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the actual data reported; and, to the best of my knowledge, the information reported on this form is accurate.

Name of Reporting Carrier: **ALL WEST COMMUNICATIONS-UT**

Signature of Authorized Officer: **Jenny Prescott**

Digitally signed by Jenny Prescott DN:cn=Jenny Prescott,email=jenny.prescott@allwest.com,O=all west communications-ut,l=Kamas UT 84036, Date:5/24/2018

Date: **5/24/2018**

Printed name of Authorized Officer: **Jenny Prescott**

Title or position of Authorized Officer: **VP Customer Service & Finance**

Telephone number of Authorized Officer: **435-783-4913**

Study Area Code of Reporting Carrier

**502288**

Filing Due Date for this form (mm/dd/yyyy)

**6/18/2018**

Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING DATA ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Data Reported on Behalf of Reporting Carrier					
I certify that (Name of Agent) <u>National Exchange Carriers Association, Inc.</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the data provided to the Authorized Agent; and, to the best of my knowledge, the actual data provided to the Authorized Agent is accurate.					
Name of Authorized Agent : <u>National Exchange Carriers Association, Inc.</u>					
Name of Reporting Carrier: <u>ALL WEST COMMUNICATIONS-UT</u>					
Signature of Authorized Officer: <u>Jenny Prescott</u>				Digitally signed by Jenny Prescott DN:cn=Jenny Prescott,email=jenny.prescott@allwest.com,O=all west communications-ut,l=Kamas UT 84036, Date:5/24/2018	
Date: <u>5/24/2018</u>					
Printed name of Authorized Officer: <u>Jenny Prescott</u>					
Title or position of Authorized Officer: <u>VP Customer Service &amp; Finance</u>					
Telephone number of authorized officer: <u>435-783-4913</u>					
Study Area Code of Reporting Carrier		<u>502288</u>		Filing Due Date for this form (mm/dd/yyyy)	<u>6/18/2018</u>
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.					

TO BE COMPLETED BY AN OFFICER OF THE REPORTING CARRIER

**Certification of Officer for Rate-of-Return Carrier Eligibility for CAF/ICC Recovery**

I certify that I am an officer of the reporting carrier and that, to the best of my knowledge, the reporting carrier on this form certifies that it has complied with Eligible Recovery §51.917(d) and Access Recovery Charge §51.917(e) and is eligible to receive the CAF ICC support requested pursuant to §51.917(f).

Name of Reporting Carrier: **ALL WEST COMMUNICATIONS-UT**

Signature of Authorized Officer or employee: **Jenny Prescott**  
Digitally signed by Jenny Prescott DN:cn=Jenny Prescott,email=jenny.prescott@allwest.com,O=all west communications-ut,|=Kamas UT 84036, Date:5/24/2018

Date: **5/24/2018**

Printed name of Authorized Officer or employee: **Jenny Prescott**

Title or position of Authorized Officer or employee: **VP Customer Service & Finance**

Telephone number of Authorized Officer or employee: **435-783-4913**

Study Area Code of Reporting Carrier	<b>502288</b>		Filing Due Date for this form (mm/dd/yyyy)	<b>6/18/2018</b>	
--------------------------------------	---------------	--	--	------------------	--

Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

TO BE COMPLETED BY AN OFFICER OF THE REPORTING CARRIER

**Certification of Officer for Rate-of-Return Carrier Not Seeking Duplicative Recovery**

I certify that I am an officer of the reporting carrier and that, to the best of my knowledge, the reporting carrier is not seeking duplicative recovery in the state jurisdiction for any Eligible Recovery subject to the recovery mechanism as per §51.917(d)(vii).

Name of Reporting Carrier: **ALL WEST COMMUNICATIONS-UT**

Signature of Authorized Officer or employee: **Jenny Prescott**  
Digitally signed by Jenny Prescott DN:cn=Jenny Prescott,email=jenny.prescott@allwest.com,O=all west communications-ut,|=Kamas UT 84036, Date:5/24/2018

Date: **5/24/2018**

Printed name of Authorized Officer or employee: **Jenny Prescott**

Title or position of Authorized Officer or employee: **VP Customer Service & Finance**

Telephone number of Authorized Officer or employee: **435-783-4913**

Study Area Code of Reporting Carrier	<b>502288</b>		Filing Due Date for this form (mm/dd/yyyy)	<b>6/18/2018</b>	
--------------------------------------	---------------	--	--	------------------	--

Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

RATE FLOOR DATA COLLECTION - OMB Control Number 3060-0986

Block 1 - Contact Information

ROW #	DATA ELEMENT	FORMAT OF REQUESTED DATA	RESPONSE
1	Carrier Study Area Code	6 numeric digits	502288
2	Carrier Study Area Name	alpha characters	ALL WEST COMMUNICATIONS-UT
3	Service Provider Identification Number	9 numeric digits	143002572
4	<b>Residential Local Service Charge Effective Date</b>	mm/dd/yy	06/01/18
5	Contact Name	alpha characters	Prescott, Jenny
6	Contact Telephone Number (include area code)	9 numeric digits	435-783-4913
7	Sheet Number	numeric digit(s)	
8	Total Number of Sheets	numeric digit(s)	

Block 2- Residential Local Service Rates, Fees, and Line Counts

	Column 1 Residential Local Service Charge	Column 2 State Subscriber Line Charge	Column 3 State Universal Service Fee	Column 4 Mandatory Extended Area Service Charge	Column 5 Loops	Column 6 Exchange Name/ Zone Name	Column 7 Class Of Service
9						435336	Residential
10						435336	Lifeline
11						435783	Residential
12						435783	Lifeline
13						435785	Residential
14						435793	Residential
15						435793	Lifeline
16						435782	Residential
17						435333	Residential

Rate Floor Template

**Certification of Officer as to the Accuracy of the Data Reported for the Rate Floor Data**

I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the actual rate floor data reported ; and, to the best of my knowledge, the information reported on this form is accurate.

Name of Reporting Carrier ALL WEST COMMUNICATIONS				
Signature of authorized officer <i>Jenny Prescott</i>			Date 6/8/2018	
Printed name of authorized officer JENNY PRESCOTT				
Title or position of authorized officer VICE PRESIDENT OF FINANCE/HR				
Telephone number of authorized officer: (435) 783-4913 ext.				
Study Area Code of Reporting Carrier	502288		Filing Due Date for this form (mm/dd/yyyy)	07/01/2018

Rate Floor Data

**TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING RATE FLOOR DATA ON THE CARRIER'S BEHALF:**

<p><b>Certification of Officer to Authorize an Agent to File Rate Floor Data on Behalf of Reporting Carrier</b></p> <p>I certify that <u>National Exchange Carrier Association (NECA)</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the actual rate floor data provided to the authorized agent; and, to the best of my knowledge, the actual rate floor data provided to the authorized agent is accurate.</p> <p>I certify that I am authorized to submit the information reported on this form on behalf of the reporting carrier; that I have provided the information reported herein based on data provided by the reporting carrier; and to the best of my knowledge the information reported herein is accurate.</p>			
Name of Authorized Agent <u>National Exchange Carrier Association (NECA)</u>			
Name of Reporting Carrier <u>ALL WEST COMMUNICATIONS</u>			
Signature of authorized officer <u>Jenny Prescott</u>			Date <u>6/8/18</u>
Printed name of authorized officer <u>JENNY PRESCOTT</u>			
Title or position of authorized officer <u>VICE PRESIDENT OF FINANCE/HR</u>			
Telephone number of authorized officer: <u>(435) 783-4913</u> ext. _____			
Study Area Code of Reporting Carrier	<u>502288</u>	Filing Due Date for this form (mm/dd/yyyy)	<u>07/01/2018</u>