



T (509) 747-2600
F (509) 624-5129

601 W. Riverside Avenue
Suite 1800
Spokane, WA 99201

VIA EMAIL: psc@utah.gov

June 15, 2020

State of Utah Public Service Commission

160 East 300 South

Salt Lake City, UT 84114

Re: Docket No. 20-999-05: 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, 2020 through June 30, 2021 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, 2020 through June 30, 2021 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 certification 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

Enclosures

cc: Ms. Jenny Prescott (via-Email)

Ms. Jenny Pettingill (via-Email)

Filing Entity	COSA	Study Area Name	TY 2018-2019 Total Eligible Recovery After True-Up Including Otherwise Unrecoverable True-Up Revenue	TY 2018-2019 Interstate Eligible Recovery (After True-Up)	TY 2018-2019 Intrastate Eligible Recovery (After True-Up)	TY 2018-2019 Net Recip. Comp. Eligible Recovery (After True-Up)	TY 2018-2019 Total of Exogenous Cost Increments	ARC True-Up for TY 2016-2017	Imputed ARC Revenue From CBOL Lines True Up For TY 2016-2017	Total of Exogenous Cost True-Ups for TY 2016-2017
All West Communications, Inc.	502288	All West Communications - UT								

TY 2016-2017 Otherwise Unrecoverable True-Up Revenue	TY 2018-2019 Double Recovery Adjustment	TY 2018-2019 Expected Maximum ARC Revenue	TY 2018-2019 Expected ARC Revenues Assessed Per 51.917(e) And Imputed Per 51.917(f)(2)	TY 2018-2019 Expected Imputed ARC Revenue From Projected CBOL Lines Per 51.917(f)(4), After 51.917(f)(5) Limit	TY 2018-2019 Expected CAF ICC Support After ARC Imputation For CBOL Lines	TY 2018-2019 Projected Res Eligible ARC Lines	TY 2018-2019 Projected SLB Eligible ARC Lines	TY 2018-2019 Projected MLB Eligible ARC Lines	TY 2018-2019 Total Projected CBOL Line Demand	TY 2018-2019 Total Projected Revenue From CBOL Lines	TY 2019-2020 Total Eligible Recovery After True-Up Including Otherwise Unrecoverable True-Up Revenue	TY 2019-2020 Interstate Eligible Recovery (After True-Up)

TY 2019-2020 Intrastate Eligible Recovery (After True-Up)	TY 2019-2020 Net Recip. Comp. Eligible Recovery (After True-Up)	TY 2019-2020 Total of Exogenous Cost Increments	ARC True-Up for TY 2017-2018	Imputed ARC Revenue From CBOL Lines True Up For TY 2017- 2018	Total of Exogenous Cost True-Ups for TY 2017-2018	TY 2017-2018 Otherwise Unrecoverable True-Up Revenue	TY 2019-2020 Double Recovery Adjustment	TY 2019-2020 Expected Maximum ARC Revenue	TY 2019-2020 Expected ARC Revenues Assessed Per 51.917(e) And Imputed Per 51.917(f)(2)	TY 2019-2020 Expected Imputed ARC Revenue From Projected CBOL Lines Per 51.917(f)(4), After 51.917(f)(5) Limit	TY 2019-2020 Expected CAF ICC Support After ARC Imputation For CBOL Lines	TY 2019-2020 Projected Res Eligible ARC Lines

TY 2019-2020 Projected SLB Eligible ARC Lines	TY 2019-2020 Projected MLB Eligible ARC Lines	TY 2019-2020 Total Projected CBOL Line Demand	TY 2019-2020 Total Projected Revenue From CBOL Lines	TY 2020-2021 Total Eligible Recovery After True-Up Including Otherwise Unrecoverable True-Up Revenue	TY 2020-2021 Interstate Eligible Recovery (After True-Up)	TY 2020-2021 Intrastate Eligible Recovery (After True- Up)	TY 2020-2021 Net Recip. Comp. Eligible Recovery (After True- Up)	TY 2020-2021 Total of Exogenous Cost Increments	ARC True-Up for TY 2018- 2019	Imputed ARC Revenue From CBOL Lines True Up For TY 2018- 2019	Total of Exogenous Cost True-Ups for TY 2018-2019	TY 2018-2019 Otherwise Unrecoverable True-Up Revenue	TY 2020-2021 Double Recovery Adjustment
---	---	--	---	---	---	---	---	--	-------------------------------------	---	--	--	--

TY 2020-2021 Expected Maximum ARC Revenue	TY 2020-2021 Expected ARC Revenues Assessed Per 51.917(e) And Imputed Per 51.917(f)(2)	TY 2020-2021 Expected Imputed ARC Revenue From Projected CBOL Lines Per 51.917(f)(4), After 51.917(f)(5) Limit	TY 2020-2021 Expected CAF ICC Support After ARC Imputation For CBOL Lines	TY 2020-2021 Projected Res Eligible ARC Lines	TY 2020-2021 Projected SLB Eligible ARC Lines	TY 2020-2021 Projected MLB Eligible ARC Lines	TY 2020-2021 Total Projected CBOL Line Demand	TY 2020-2021 Total Projected Revenue From CBOL Lines
--	---	--	--	---	--	--	--	--

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, this 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, Inc. - Utah**

Signature of authorized officer _____ Date **05/26/2020**

Printed name of authorized officer **Jenny Prescott**

Title or position of authorized officer **VP/Finance**

Telephone number of authorized officer: **4357834913**, ext. _____

Study Area Code of Reporting Carrier	502288	Filing Due Date for this form (mm/dd/yyyy)	06/16/2020
--------------------------------------	---------------	--	-------------------

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.

Signature: *Jenny L Prescott*
Jenny L Prescott (May 26, 2020 14:47 MDT)

Email: jenny.prescott@allwest.com

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, Inc. - Utah**

Signature of authorized officer _____ Date **05/26/2020**

Printed name of authorized officer **Jenny Prescott**

Title or position of authorized officer **VP/Finance**

Telephone number of authorized officer: **4357834913**, ext. _____

Study Area Code of Reporting Carrier	502288	Filing Due Date for this form (mm/dd/yyyy)	06/16/2020
--------------------------------------	---------------	--	-------------------

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.

Signature: *Jenny L Prescott*
Jenny L Prescott (May 26, 2020 14:47 MDT)

Email: jenny.prescott@allwest.com

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, Inc. - Utah**

Signature of Authorized Officer

Date **05/26/2020**

Printed name of Authorized Officer **Jenny Prescott**

Title or position of Authorized Officer **VP/Finance**

Telephone number of Authorized Officer: **(435)7834913**, ext.

Study Area Code of Reporting Carrier

502288

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

06/16/2020

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.

Signature: *Jenny L Prescott*
Jenny L Prescott (May 26, 2020 14:40 MDT)

Email: jenny.prescott@allwest.com

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) Moss Adams LLP 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 are accurate.

Name of Authorized Agent Moss Adams LLP

Name of Reporting Carrier All West Communications, Inc. - Utah

Signature of Authorized Officer

Date 05/26/2020

Printed name of Authorized Officer Jenny Prescott

Title or position of Authorized Officer VP/Finance

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)

06/16/2020

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.

Signature: Jenny L Prescott
Jenny L Prescott (May 26, 2020 14:39 MDT)

Email: jenny.prescott@allwest.com

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 COMM-UT

Signature of Authorized Officer: *Digitally signed by Jenny Prescott DN:cn=Jenny Prescott,email=jenny.prescott@allwest.com,O=ALL WEST COMM-UT,/=,Date:06/11/2019*

Date: 06/11/2019

Printed name of Authorized Officer: Jenny Prescott

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

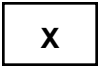
Telephone number of Authorized Officer: 435-783-4913

Study Area Code of Reporting Carrier

502288

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

07/01/2019



I certify that our company receives or is projected to receive High Cost Loop Support (or Frozen High Cost Support that is based on HCLS or High Cost Model Support) during the period July 2019 through June 2020, but has no monthly residential rates (plus charges as defined) less than \$18.00.