



MOSSADAMS

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Stockton, CA 95219

June 13, 2019

State of Utah Public Service Commission

160 East 300 South

Salt Lake City, UT 84114

Re: Docket No. 19-999-13: 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, 2019 through June 30, 2020 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, 2019 through June 30, 2020 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)
Ms. Anna Middleton (Via-Email)



2019 CAF ICC Data Collection

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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 2019-2020 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	7/1/2019 Interstate Rate	Test Year 2018-2019 Current Intrastate Rate	7/1/2019 Proposed Intrastate Rate	FY 2011 Intrastate Units Terminating for Non-Dedicated or Originating and Terminating for Dedicated Elements	Intrastate Price-out with 7/1/2019 proposed intrastate rate and FY2011 Demand	FY 2018 Intrastate Units Terminating for Non-Dedicated and total for Dedicated Elements	Test Year 2019-2020 Forecasted Intrastate Units	Intrastate Units Growth Rate %	TY 2019-20 Forecasted Intrastate Revenue
Terminating End Office Access Service Terminating End Off ce, Premium, per access minute	MOU	\$0.00070000	\$0.00213300	\$0.00070000						
Terminating End Office Access Service Terminating End Off ce, Non-Premium, per access minute	MOU	\$0.00070000	\$0.00213300	\$0.00070000						
Entrance Facil ty, Per Terminat on Voice Grade Two Wire	Terminat on	\$30.51	\$30.65	\$30.51						
Entrance Facil ty, Per Terminat on Voice Grade Four Wire	Terminat on	\$48.83	\$49.05	\$48.83						
Entrance Facil ty, Per Terminat on High Capac ty DS1	Terminat on	\$148.75	\$149.42	\$148.75						
Entrance Facil ty, Per Terminat on High Capac ty DS3	Terminat on	\$1,358.18	\$1,364.26	\$1,358.18						
Entrance Facil ty, Per Terminat on Synchronous Opt cal Channel OC3	Terminat on	\$1,384.96	\$1,391.16	\$1,384.96						
Entrance Facil ty, Per Terminat on Synchronous Opt cal Channel OC12	Terminat on	\$1,478.68	\$1,485.30	\$1,478.68						
Entrance Facil ty, Per Terminat on ESALT 2 Mbps	Circuit	\$263.47	\$264.65	\$263.47						
Entrance Facil ty, Per Terminat on ESALT 10 Mbps	Circuit	\$283.97	\$285.24	\$283.97						
Entrance Facil ty, Per Terminat on ESALT 50 Mbps	Circuit	\$367.90	\$369.55	\$367.90						
Direct Trunked Transport Facility/ Mile Vo ce Grade - Two Wire & Four Wire	Mile	\$2.16	\$2.17	\$2.16						
Direct Trunked Transport Facility/ Mile High Capacity DS1	Mile	\$10.17	\$10.22	\$10.17						
Direct Trunked Transport Facility/ Mile High Capacity DS3	Mile	\$88.76	\$89.16	\$88.76						
Direct Trunked Transport Facility/ Mile Synchronous Opt cal Channel OC3	Mile	\$95.02	\$95.45	\$95.02						
Direct Trunked Transport Facility/ Mile Synchronous Opt cal Channel OC12	Mile	\$119.27	\$119.80	\$119.27						
Direct Trunked Transport Facility/ Mile ESALT 2 Mbps DTF-E1	Circuit Miles	\$30.02	\$30.15	\$30.02						
Direct Trunked Transport Facility/ Mile ESALT 2 Mbps DTF-E2	Circuit Miles	\$20.01	\$20.10	\$20.01						
Direct Trunked Transport Facility/ Mile ESALT 2 Mbps DTF-E3	Circuit Miles	\$80.78	\$81.14	\$80.78						
Direct Trunked Transport Facility/ Mile ESALT 2 Mbps DTF-E4	Circuit Miles	\$135.26	\$135.87	\$135.26						
Direct Trunked Transport Facility/ Mile ESALT 10 Mbps DTF-E1	Circuit Miles	\$76.10	\$76.44	\$76.10						

Direct Trunked Transport Facility/ Mile ESALT 10 Mbps DTF-E2	Circuit Miles	\$45.66	\$45.86	\$45.66
Direct Trunked Transport Facility/ Mile ESALT 10 Mbps DTF-E3	Circuit Miles	\$203.33	\$204.24	\$203.33
Direct Trunked Transport Facility/ Mile ESALT 10 Mbps DTF-E4	Circuit Miles	\$417.05	\$418.92	\$417.05
Direct Trunked Transport Facility/ Mile ESALT 50 Mbps DTF-E1	Circuit Miles	\$213.12	\$214.07	\$213.12
Direct Trunked Transport Facility/ Mile ESALT 50 Mbps DTF-E2	Circuit Miles	\$142.09	\$142.73	\$142.09
Direct Trunked Transport Facility/ Mile ESALT 50 Mbps DTF-E3	Circuit Miles	\$664.07	\$667.04	\$664.07
Direct Trunked Transport Facility/ Mile ESALT 50 Mbps DTF-E4	Circuit Miles	\$1,183.48	\$1,188.78	\$1,183.48
Direct Trunked Transport Facility/Termination on Voice Grade - Two Wire & Four Wire	Termination	\$21.84	\$21.94	\$21.84
Direct Trunked Transport Facility/Termination on High Capacity DS1	Termination	\$52.88	\$53.12	\$52.88
Direct Trunked Transport Facility/Termination on High Capacity DS3	Termination	\$339.56	\$341.08	\$339.56
Direct Trunked Transport Facility/Termination on Synchronous Optical Channel OC3	Termination	\$353.54	\$355.12	\$353.54
Direct Trunked Transport Facility/Termination on Synchronous Optical Channel OC12	Termination	\$769.75	\$773.20	\$769.75
Direct Trunked Transport Facility/Termination on ESALT 2 Mbps	Circuit terms	\$70.06	\$70.37	\$70.06
Direct Trunked Transport Facility/Termination on ESALT 10 Mbps	Circuit terms	\$85.63	\$86.01	\$85.63
Direct Trunked Transport Facility/Termination on ESALT 50 Mbps	Circuit terms	\$104.65	\$105.12	\$104.65
Multiplexing, Per Arrangement DS3 to DS1	Termination	\$309.80	\$311.19	\$309.80
Multiplexing, Per Arrangement DS1 to Voice	Termination	\$119.61	\$120.15	\$119.61
Customer Node Per Node OC3 155.52 Mbps	Port	\$321.60	\$323.04	\$321.60
Customer Node Per Node OC12 622.08 Mbps	Port	\$929.05	\$933.21	\$929.05
Customer Premises Port, Per Port OC3 155.52 Mbps	Port	\$105.51	\$105.98	\$105.51
Customer Premises Port, Per Port STS-1 51.84 Mbps	Port	\$126.70	\$127.27	\$126.70
Customer Premises Port, Per Port DS3 44.736 Mbps	Port	\$126.70	\$127.27	\$126.70
Customer Premises Port, Per Port DS1 1.544 Mbps	Port	\$32.47	\$32.62	\$32.47
Add/Drop Multiplexing Central Office Port, Per Port DS1 1.544 Mbps	Port	\$25.99	\$26.11	\$25.99
Add/Drop Multiplexing Central Office Port, Per Port OC3 155.52 Mbps	Port	\$105.51	\$105.98	\$105.51
Add/Drop Multiplexing Central Office Port, Per Port DS3 44.736 Mbps	Port	\$64.96	\$65.25	\$64.96
Network Blocking, Per Blocked Call Network Blocking, Per Blocked Call, Applies to FGD only	Call	\$0.01660000	\$0.01670000	\$0.01660000
ESALT Real Time CoS/QoS, Per ESALT DTF-E1 Facility ESALT 2 Mbps	Facility	\$5.73	\$5.76	\$5.73
ESALT Real Time CoS/QoS, Per ESALT DTF-E1 Facility ESALT 10 Mbps	Facility	\$28.72	\$28.85	\$28.72
ESALT Real Time CoS/QoS, Per ESALT DTF-E1 Facility ESALT 50 Mbps	Facility	\$89.29	\$89.69	\$89.29
ESALT Entrance Facility Protection, Per ESALT Entrance	Circuit	\$288.40	\$289.69	\$288.40

Facility ESALT 2 Mbps				
ESALT Entrance Facility Protection, Per ESALT Entrance Facility ESALT 10 Mbps	Circuit	\$288.40	\$289.69	\$288.40
ESALT Entrance Facility Protection, Per ESALT Entrance Facility ESALT 50 Mbps	Circuit	\$288.40	\$289.69	\$288.40
Common Channel Signaling Network Connect on Signaling Mileage Facility, Per Mile	Mile	\$2.93	\$2.94	\$2.93
Common Channel Signaling Network Connect on Signaling Mileage Termination, Per Termination	Termination	\$29.41	\$29.54	\$29.41
Common Channel Signaling Network Connect on Signaling Entrance Facility, Per Facility	Facility	\$56.31	\$56.56	\$56.31
Common Channel Signaling Network Connect on STP Port, Per Port	Port	\$290.20	\$291.50	\$290.20
Terminating Tandem Switched Transport Terminating Tandem Switched Transport Facility	Minutes / Mile	\$0.00043700	\$0.00043900	\$0.00043700
Terminating Tandem Switched Transport Terminating Tandem Switched Termination	Minutes	\$0.00226700	\$0.00227700	\$0.00226700
Terminating Tandem Switched Transport Terminating Tandem Switching	Minutes	\$0.00571800	\$0.00574400	\$0.00571800
Nonrecurring Charges Voice Grade Two Wire	Facility	\$488.17	\$490.36	\$488.17
Nonrecurring Charges Voice Grade Four Wire	Facility	\$488.17	\$490.36	\$488.17
Nonrecurring Charges High Capacity DS1	Facility	\$358.01	\$359.61	\$358.01
Nonrecurring Charges High Capacity DS3	Facility	\$482.75	\$484.91	\$482.75
Nonrecurring Charges Synchronous Optical Channel OC3	Facility	\$390.54	\$392.29	\$390.54
Nonrecurring Charges Synchronous Optical Channel OC12	Facility	\$390.54	\$392.29	\$390.54
Nonrecurring Charges Interim NXX Translation, Per Order	Order	\$238.67	\$239.74	\$238.67
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	\$479.49	\$481.64	\$479.49
Nonrecurring Charges Trunk Activation, per 24 trunks activated or fraction thereof on a per order basis	Order	\$497.93	\$500.16	\$497.93
Nonrecurring Charges Flexible Automatic Number Identification (Flex ANI), per End Office, per CIC	End Office	\$0.00000000	\$0.00000000	\$0.00000000
Nonrecurring Charges ESALT 2 Mbps	Facility	\$578.57	\$581.16	\$578.57
Nonrecurring Charges ESALT 10 Mbps	Facility	\$578.57	\$581.16	\$578.57
Nonrecurring Charges ESALT 50 Mbps	Facility	\$578.57	\$581.16	\$578.57
Nonrecurring Charges ESALT Direct Trunked Termination, per ESALT Direct Trunked Termination installed	Order	\$381.18	\$382.89	\$381.18
Nonrecurring Charges ESALT Entrance Facility Protection, per ESALT Entrance Facility	Facility	\$584.82	\$587.44	\$584.82

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

CONNECT AMERICA FUND

[Data to be provided to USAC/FCC in June 2019 for CAF ICC Purposes]

Settlement Type: Cost

Test Period 7/1/19-6/30/20 Post True-up (Filing)

View

Rate-of-Return (ROR) Carrier Revenue Requirement	
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 ^ 8)
6	ROR Carrier Revenue Requirement (Line 4 x Line 5)
7	Pool Administration Expenses
8	Total ROR Carrier Revenue Requirement (Line 6 + Line 7)
Revenues from Reformed Inter-carrier Compensation (ICC) Rates	
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)
Eligible Recovery	
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 17/18 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)
Revenues from Access Recovery Charges (ARC)	
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)
Connect America Fund (CAF) ICC Support**	
25	Connect America Fund (CAF) ICC Support (Line 20 - Line 24)
Revised CAF ICC Support with Imputed ARC Revenues for Broadband-Onl	

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

27 **Adjusted Test Period 2019-2020 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.



2019 CAF ICC Data Collection

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

Access Recovery Charges

Recalculate ARC Rates & CAF Support revenues

Test Period 2019-20 Pre-True-up View Test Period 2019-20 Post-True-Up (Filing) View

Test Period 2019-2020 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										
Study Area Summary										

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:5/20/2019

Date: **5/20/2019**

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)

6/17/2019

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:5/20/2019	
Date: <u>5/20/2019</u>					
Printed name of Authorized Officer: <u>Jenny Prescott</u>					
Title or position of Authorized Officer: <u>VP Customer Service & 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>6/17/2019</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:5/20/2019

Date: **5/20/2019**

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	502288		Filing Due Date for this form (mm/dd/yyyy)	6/17/2019	
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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,l=Kamas UT 84036, Date:5/20/2019

Date: **5/20/2019**

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	502288		Filing Due Date for this form (mm/dd/yyyy)	6/17/2019	
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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.

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	
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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.