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May 30, 2019

Office of the Clerk
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399

RECEIVED-FPSC
2019 MAY 31 AM 10:05
COMMISSION
CLERK

Re: TeleQuality Communications – Florida Rate Sheet No. 3

Dear Madam or Sir:

TeleQuality Communications, LLC submits the attached Rate Sheet 3 to replace “Rate Sheet 1” filed with the Commission April 25, 2018.

At this time, TeleQuality only provides unregulated services in Florida. These services are offered to health care providers, predominately in rural areas, and are supported, in part, through funds from the federal Rural Health Care (“RHC”) program which is administered by the Federal Communications Commission and the Universal Service Administrative Company. Federal rules require TeleQuality, in certain circumstances, to file with state regulatory commissions tariffs and supporting, itemized costs for all federally-supported services offered within that state. Based on recent discussions between TeleQuality and federal regulators, this filing is being made to comply with those federal rules.

Attached is a rate sheet describing the services and rates offered by TeleQuality in Florida. Attached also is a confidential itemization of the costs of each service to support the rates charged for each bandwidth. We ask that the Commission keep the cost information confidential.

We respectfully submit that these rates are justified not only by the itemized costs but by geographic conditions in Florida. Our customers are typically located in very rural areas with unique geographic challenges. We also note that there are risks inherent in delivering services to rural customers under the RHC program – namely, that TeleQuality is assuming the risks of (1) higher credit risk of rural health care clinics, and (2) significant risk of delivery costs exceeding estimates due to the otherwise unserved or underserved nature of many of the sites affecting the availability of existing infrastructure that TeleQuality may contract with to provision the service.

While TeleQuality recognizes that the Florida Commission does not currently regulate the services described in this rate sheet, the Federal Communications Commission has stated that in such circumstance, “We encourage state commissions to review these proposed rates according to

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procedures and requirements similar to those used for establishing tariffed rates or telecommunications services in their states. . . .” In the Matter of Federal-State Joint Board on Universal Service, Report and Order, CC Docket No. 96-45, FCC 97-157, 12 FCC Rcd 8776 (1997) paragraph 661.

Please acknowledge receipt of this by date-stamping the extra copy and returning it in the envelope that is provided for this purpose. Please call me if you have any questions. Thank you again for your assistance.

Very truly yours,

BRADLEY ARANT BOULT CUMMINGS, LLP


Henry Walker

Enclosures

SERVICES RATES

Service is designed and provisioned on an Individual Case Basis (ICB) pursuant to contracts with Customers. All requesting Customers shall have nondiscriminatory access to ICB Services and facilities at nondiscriminatory rates, terms and conditions. While TeleQuality will provide service at the published rates, contract prices may be less than, but not more than, the published rates based on competitive market considerations and factors such as the number of locations to be connected, physical location of each facility, availability of existing infrastructure to support network requirements, speed, latency, jitter, network availability requirements, costs to obtain underlying services from RLEC, ILEC and CLEC providers, internal equipment costs required by TeleQuality to provide service, and collocation facilities required to integrate services from multiple providers.

Bandwidth	Recurring Monthly Rate
20 Mbps	\$5,426
45 Mbps	\$1,190
50 Mbps	\$947
100 Mbps	\$3,836

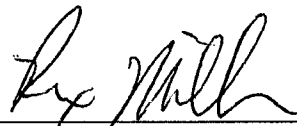
THE STATE OF TEXAS §
 §
COUNTY OF BEXAR §

AFFIDAVIT

“I, Rex Miller, swear under penalty of perjury that I am the General Manager of TeleQuality Communication, LLC (“TeleQuality”) and that I am authorized to make this Affidavit on behalf of TeleQuality.

“I hereby further state that the itemized cost data contained in the cost sheet provided is proprietary and confidential because it contains information not intended for public consumption, which would not otherwise be made publicly available, and the release of which could cause TeleQuality irreparable and incalculable harm if it became known to current or future competitors. Accordingly, TeleQuality requests that this information be kept confidential and withheld from public disclosure or inspection.”


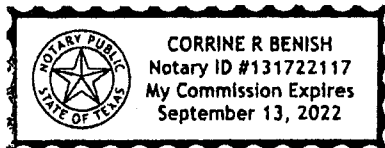
Executed this 30 day of May, 2019, at San Antonio, Texas.



Rex Miller
General Manager
TeleQuality Communications, LLC

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SWORN TO AND SUBSCRIBED before me this 30th day of May, 2019.



Notary Public, State of Texas