RUTLEDGE ECENIA

PROFESSIONAL ASSOCIATION ATTORNEYS AND COUNSELORS AT LAW

POST OFFICE BOX 551, 32302-0551 119 SOUTH MONROE STREET, SUITE 202 TALLAHASSEE, FLORIDA 32301-1841

> TELEPHONE (850) 681-6788 TELECOPIER (850) 681-6515

> > June 16, 2014

FILED JUN 16, 2014 DOCUMENT NO. 03026-14 FPSC - COMMISSION CLERK

MARSHA E. RULE GARY R. RUTLEDGE MAGGIE M. SCHULTZ GABRIEL F.V. WARREN

GOVERNMENTAL CONSULTANT JONATHAN M. COSTELLO

OF COUNSEL HAROLD F. X. PURNELL

CONFIDENTIAL DOCUMENTS ENCLOSED

VIA HAND DELIVERY

Ms. Carlotta Stauffer, Director Division of the Commission Clerk and Administrative Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

> Re: PSC Docket No. 140119-TP Northeast Florida Telephone Company's Annual Reporting Requirements for High – Cost Recipients and Certification of Support for Eligible Telecommunications Carriers

Dear Ms. Stauffer:

Enclosed for filing in the above referenced docket are the following documents:

- (1) Northeast Florida Telecom's ("NEFCOM") Certification that NEFCOM is not seeking duplicative recovery in the state for any eligible recovery subject to the recovery mechanism pursuant to FCC guidelines and U.S.C. section 51.917(d)(vii);
- (2) Certification that NEFCOM has complied with pertinent FCC rules and is thus eligible to receive CAF/ICC support, pursuant to FCC guidelines and U.S.C. section 51.917(f)(3);
- (3) Certification by a NEFCOM officer as to the accuracy of the CAF/ICC data reported; and
- (4) The pertinent data establishing NEFCOM's eligibility for CAF/ICC funding during the upcoming funding period pursuant to FCC guidelines and U.S.C. sections 51.917 and 54.304(d).

MICHAEL J. BARRY STEPHEN A. ECENIA RICHARD M. ELLIS DIANA M. FERGUSON MARTIN P. McDONNELL J. STEPHEN MENTON R. DAVID PRESCOTT



CLAIM OF CONFIDENTIALITY

Pursuant to Section 364.183(1), Florida Statutes, and Rule 25-22.006(5)(a), Florida Administrative Code, NEFCOM hereby claims confidential treatment for the following documents regarding this response to the annual reporting requirements for high-cost recipients and certification of support for eligible telecommunications carriers:

Response No. 4 – the data supporting the projected amount for CAF support including 1. information used to calculate the access recovery charge: disclosure of NEFCOM's response to this item would provide NEFCOM's competitors with proprietary confidential information regarding NEFCOM's involvement in the highly competitive market which services within NEFCOM's service territory. This type of proprietary confidential business information is not made public under any other circumstances.

Enclosed herewith are the following attachments:

- Attachment "A" two copies of Northeast Florida's Response with the specific (1) information claimed to be confidential redacted; and
- Attachment "B"- a sealed envelope marked "CONFIDENTIAL" containing Northeast (2) Florida's Response with the specific information claimed to be confidential highlighted in yellow.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the copy to me. Thank you for your assistance with this filing.

Sincerely,

Marshe E. Dule for Martin P. McDonnell

Enclosures

ATTACHMENT "A"

REDACTED

NÉCA

[Print this page]

Study Area: NORTHEAST FLORIDA (ID: 210335) Holding Company: TOWNES TELECOMMUNICATIONS (ID: 200000264)

CONNECT AMERICA FUND

Data to be Provided to USAC/FCC in June 2014 for CAF ICC Purposes

Current Settlement Type: Cost

Test Period 7/1/14-6/30/15 Post True-up (FilingREDACTED

		View							
Rate-of-Return (ROR) Carrier Revenue Requirement									
	1	2011 Interstate Switched Access Revenue Requirement							
	2	FY 2011 Intrastate Terminating Switched Access Revenues	CALER AND						
	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 x 0.95 x 0.95)							
	6.	ROR Carrier Revenue Requirement (Line 4 x Line 5)	499000						
	7	Pool Administration Expenses							
	8	Total ROR Carrier Revenue Requirement (Line 6 + Line 7)							
		Revenues from Reformed Intercarrier 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							
	18	Adjustment for Double Recovery or Corrections	\$\$						
	19	Test Period 12/13 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)							

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.

2014 CAF ICC Data Collection

e.



2014 CAF ICC Data Collection Update

NECA Home NECA Data Collections Contact Us General Instructions Logout Logged in User: Deborah Nobles

Home Select Company Electronic Certifications > Main Page Study Area Data Input Menu > CAF & ARC Output >

Study Area: NORTHEAST FLORIDA (ID: 210335) Holding Company: TOWNES TELECOMMUNICATIONS (ID: 200000264)

S (ID: 200000264) Access Recovery Charges

Recalculate ARC Rates & CAF. Support revenues

tudy E \rea ID	xchange/Zone Name	Residential Lines excluding Lifelines	Residential ARC	Residential ARC Revenue	SLB ARC	SLB ARC Revenue	MLB ARC	MLB ARC Revenue	Total ARC Revenue	
10335 10335	MACCLENNY SANDERSON		\$	\$ (419) \$ (419)					r te godin da N	
0335	Study Area Summary		\$ [\$					
			•	. •	•		•			
		• •				· •	••••			
										Ī
									•	
		•								
		•	•			•				
			• •			•	• .		•	
		•				- '			•	
	·		· 、 ·	•	•	•				
		•		. •		•	• •		,	- e 🏚
				•		• .				
						· ·				•
				:						•
		•	•	•			.• *			•
			•	•	•					ا مې ا
		· .								
			•			•			s ···	
			•		• •				•	
					•					
					•				Corte	
			. •	•	•		•			
			;			•			ه و فر	
•				÷				•	•	
	•					•••				
•				•					4.	

https://www.necainfo.org/ICC_CAF/source/ARCChanges.aspx

2014 CAF ICC Data Collection

NÉCA>

2014 CAF ICC Data Collection Update

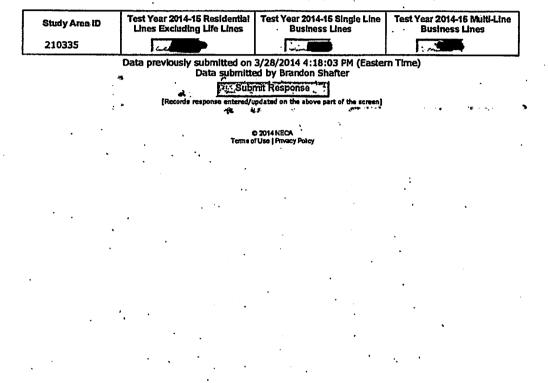
NECA Home NECA Data Collections Contact Us General Instructions Logout Logged in User: Deborah Nobles

Home Select Company Electronic Certifications > Main Page Study Area Data Input Menu > CAF & ARC Output >

Study Area: NORTHEAST FLORIDA (ID: 210335) Holding Company: TOWNES TELECOMMUNICATIONS (ID: 200000264)

Test Period 2014/2015

Study Area Lines for Test Period 2014/2015 - (July 1, 2014 - June 30, 2015)



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: NORTH	AST FLORIDA		·	h Nobles DN cn=Deboreh						
Debor Signature of Authorized Officer:	Date: 5/19/2014									
Printed name of Authorized Officer:	Deborah Nob	les								
Title or position of Authorized Officer:	VP Regulatory	Affairs	•	•						
Telephone number of Authorized Officer.	904-688-0029									
Study Area Code of Reporting Carrier	210335	State State	Filing Due Date for this form (mm/dd/yyyy)	6/16/2014						
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. § 1091.										

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. NORTHEAS	T FLORIDA	•		•	·	•				
	Deborah	Nobles	Noble		h Nobles DN cn=Deboreh wnes.net,O=northeast flonda,t=	•				
Signature of Authorized Officer or employee:		•				Date 5/19/2014				
	•		•	-	• • •					
Printed name of Authorized Officer or employee		Deborah Nol	bles							
Title or position of Authorized Officer or employee: VP Regulatory Affairs										
Telephone number of Authorized Officer or emp	loyee:	904-688-00	129	•	•					
Study Area Code of Reporting Carrier	210335			te for this form	6/16/2014					
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).										
. 1	 		· .		. ·		· .			
Name of Reporting Carrier. NORTHE	AST FLORIDA		• •			-		•		
Signature of Authorized Officer or employee:	Deborah	Nobles	Noble	lly signed by Da s,emad=dnoble: 5/19/2014	borah Noblas 5@townes.na	s DN cn=Debore t,O=northeast fix	h ≫rida,i≖ , -	Date	5/19/2014	
• •	• .	• .		• .		• .		.		
Printed name of Authonized Officer or employee: Deborah Nobles										
Title or position of Authorized Officer or emplo	oyee:	VP Regulat	ory Affairs	•			•		•	
Telephone number of Authonized Officer or er	nployee:	904-688-00			•	· · ·	•		•	
Study Area Code of Reporting Carrier	210335		Filing Due Da (mm/dd/yyyy)		m	6/16/2014	1			
Persons wilfully making false state §§ 502, 503(b)	ments on this fo), or fine or impr	orm can be punk Isonment under	shed by fine or Title 18 of the l	forfeiture und United States	er the Com Code, 18 U	munications / .S.C. § 1001.	Act of 1934, 4	17 U.S.C.		