

**RUTLEDGE ECENIA**  
PROFESSIONAL ASSOCIATION  
ATTORNEYS AND COUNSELORS AT LAW

STEPHEN A. ECENIA  
DIANA M. FERGUSON  
J. STEPHEN MENTON  
CRAIG D. MILLER  
MARSHA E. RULE

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

TELEPHONE (850) 681-6788  
TELECOPIER (850) 681-6515  
www.rutledge-ecenia.com

GARY R. RUTLEDGE  
MAGGIE M. SCHULTZ  
TANA D. STOREY  
GABRIEL F.V. WARREN  
GOVERNMENTAL CONSULTANT  
JONATHAN M. COSTELLO  
OF COUNSEL  
DAVID M. MALONEY  
R. DAVID PRESCOTT  
HAROLD F. X. PURNELL

December 19, 2016

Ms. Carlotta Stauffer  
Office of the Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

RE: Northeast Florida Telephone Company's Revised Annual Reporting Requirements  
and  
Claim of Confidential Classification

Dear Ms. Stauffer:

The following documents are enclosed for filing on behalf of Northeast Florida Telephone Company d/b/a NEFCOM ("NEFCOM"):

1. NEFCOM's redacted 2016 USAC Data Report (Test Period 2016-2017);
2. NEFCOM's redacted report entitled Revised CAF ICC Support with Imputed ARC Revenue for Consumer Broadband Loops;
3. Certification as to the accuracy of the CAF/ICC data reported; and
4. Confidential versions of items 1 and 2, above.

RECEIVED-FPSC  
2016 DEC 19 PM 3:35  
COMMISSION CLERK

**CLAIM OF CONFIDENTIAL CLASSIFICATION**

COM \_\_\_\_\_  
AFD \_\_\_\_\_  
APA \_\_\_\_\_  
ECO \_\_\_\_\_  
ENG \_\_\_\_\_  
GCL \_\_\_\_\_  
IDM \_\_\_\_\_  
TEL \_\_\_\_\_  
CLK \_\_\_\_\_

Pursuant to Section 364.183(1), Florida Statutes, and Rule 25-22.006(5)(a), Florida Administrative Code, NEFCOM claims that certain financial information in the documents listed in Item No. 4, above, is confidential. Specifically, data that is redacted from Attachment "A" hereto and highlighted in Confidential Attachment "B" is confidential and proprietary information that should be kept confidential and exempt from public disclosure because such disclosure would provide NEFCOM's competitors with proprietary confidential information regarding the company's involvement in the highly competitive market within its service territory.

**REDACTED**

**RUTLEDGE ECENIA**

Ms. Carlotta Stauffer  
December 19, 2016  
Page 2

The following attachments are enclosed:

Attachment "A" – two copies of NEFCOM's Items 1-3, above, from which the specific information claimed to be confidential has been redacted; and

Confidential Attachment "B" – a sealed envelope marked "CONFIDENTIAL" containing the documents identified in NEFCOM's Item No. 4, above, with confidential information 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,



Marsha E. Rule

MER/rl  
Enclosures

Cc: Beth Salak (letter only)

**ATTACHMENT "A"**

**Redacted**



### 2016 CAF ICC Data Collection

[NECA Home](#) [NECA Data Collections](#) [Contact Us](#) [CAF ICC - Instructions & Documents](#) [Paper Certification Tracking](#) [Logout](#)

Logged in User: Amanda Molina



[Home](#) [Select Company](#) [Main Page](#) [Study Area Data Input Menu](#) ▶ [CAF & ARC Output](#) ▶ [E-Certification](#) ▶

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

#### Revised CAFICC Support with Imputed ARC Revenue for Consumer Broadband Loops

[\[ View the calculation method \]](#)

Line ID	Line Description	Amount
10	Projected Average Monthly Consumer Broadband-Only Loops	[REDACTED]
20	Test Period 2016-2017 Projected ARC Revenues	[REDACTED]
30	Test Period 2016-2017 Total Lines excluding Life Line	[REDACTED]
40	Average ARC per Line per Month	[REDACTED]
50	ARC Revenue Adjustment	[REDACTED]
60	Test Period 2016-2017 CAFICC Support	[REDACTED]
<b>70</b>	<b>Adjusted Test Period 2016-2017 CAFICC Support</b>	[REDACTED]

© 2016 NECA  
[Terms of Use](#) | [Privacy Policy](#)



**2016 CAF ICC Data Collection**

[NECA Home](#)
[NECA Data Collections](#)
[Contact Us](#)
[CAF ICC - Instructions & Documents](#)
[Paper Certification Tracking](#)
[Logout](#)

Logged in User: Amanda Molina



[Home](#)
[Select Company](#)
[Main Page](#)
[Study Area Data Input Menu](#)
▶ [CAF & ARC Output](#)
▶ [E-Certification](#)
▶

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

**Study Area USAC Reports**

[ [View Printer-friendly report](#) ]

2016 USAC Data Report (Test Period 2016-2017) ▼

**CONNECT AMERICA FUND**

Data to be provided to USAC/FCC in December 2016 for CAF ICC Purposes

**Current Settlement Type: Cost**

Test Period 7/1/16-6/30/17 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 ^ 5)	██████████
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	██████████

18	Adjustment for Double Recovery or Corrections	██████████
19	Test Period 14/15 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 Consumer Broadband-Only Loops</b>		
26	ARC Revenue Adjustment	██████████
27	<b>Adjusted Test Period 2016-2017 CAFICC Support (Line 25 - Line 26)</b>	██████████

**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.

© 2016 NECA  
 Terms of Use | Privacy Policy

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: <b>NORTHEAST FLORIDA</b>					
Signature of Authorized Officer: <b>Amanda Molina</b>				Digitally signed by Amanda Molina DN: cn=Amanda Molina, email=ramolina@townes.net, o=northeast florida, c= Date:12/6/2016	
Date: <b>12/6/2016</b>					
Printed name of Authorized Officer: <b>Amanda Molina</b>					
Title or position of Authorized Officer: <b>Vice President of External Relations</b>					
Telephone number of Authorized Officer: <b>904.259-0029</b>					
Study Area Code of Reporting Carrier		210335		Filing Due Date for this form (mm/dd/yyyy)	12/19/2016
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.					

**ATTACHMENT "B"**

**Confidential**