



HARRIS, WILTSHIRE  
& GRANNIS LLP

June 22, 2018

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***Via Hand Delivery***

Ms. Marlene H. Dortch

Secretary

Federal Communications Commission

445 12<sup>th</sup> Street, SW

Washington, DC 20554

Federal Communications Commission  
Office of the Secretary

DOCKET FILE COPY ORIGINAL

Re: *Promoting Telehealth and Telemedicine in Rural America*, WC Docket No. 17-310

Dear Ms. Dortch,

TeleQuality Communications, LLC (“TeleQuality”) hereby submits for the Commission’s approval additional interstate rural rates for purposes of providing service to healthcare providers (“HCPs”) through the Rural Health Care Telecommunications Program.

TeleQuality is currently working with HCPs seeking telecommunications services for 2018 through the Telecommunications Program. To establish its rural rates for 2018, TeleQuality has followed the requirements of 47 C.F.R. § 54.607 and the recent USAC guidance.<sup>1</sup> TeleQuality does not provide service to commercial customers other than HCPs, so it cannot calculate rural rates based on the average rate charged to commercial customers for similar services pursuant to 47 C.F.R. § 54.706(a) (USAC’s Method 1). In some cases, TeleQuality may be able to establish a rural rate by calculating the average of tariffed or other publicly available rates for similar services in the same rural area pursuant to 47 C.F.R. § 54.706(b) (USAC’s Method 2). In cases where due diligence has not revealed any tariffed or other publicly available rates for “the same or similar services in that rural area over the same distance as the eligible service,” or where TeleQuality has reasonably determined that Method 2 results in a rate that is “unfair,” TeleQuality must submit its rates for interstate services to the Commission for approval pursuant to 47 C.F.R. § 54.607(b) (USAC Method 3).

Attached please find TeleQuality’s interstate rates for the Telecommunications Program for Funding Year 2018 (shown in Attachment 1 as the TeleQuality 2018 Interstate Rate Sheet) for areas served using USAC Method 3. Also attached, as required by 47 C.F.R. § 54.706(b)(1), is the justification for TeleQuality’s rural rates including cost itemizations (shown in Attachment 2 as the TeleQuality 2018 Interstate Rate Cost Justification).

These rates are all for services that are interstate interexchange and/or CLEC business data services, and which were subject to competitive bidding. As such, these are all services that

<sup>1</sup> USAC, *Telecom Program: Urban and Rural Rates*, [https://www.usac.org/\\_res/documents/rhc/pdf/handouts/TelecomRuralUrbanRateInfo.pdf](https://www.usac.org/_res/documents/rhc/pdf/handouts/TelecomRuralUrbanRateInfo.pdf).

the Commission has mandatorily or permissively detariffed because of the presence of a competitive market. *See* 47 C.F.R. § 61.19; *Hyperion Telecommunications Inc. Petition Requesting Forbearance*, Memorandum Opinion and Order and Notice of Proposed Rulemaking, 12 FCC Rcd 8596 (1997) (“[W]e have previously determined that [CLECs] are nondominant, and that nondominant carriers, ‘by definition,’ cannot exercise market power.”) *See also* 47 C.F.R. § 61.201 (detariffing ILEC business data services). Moreover, even if a tariff were filed (which is no longer permitted for interexchange services, including interexchange private lines), these are rates charged by a nondominant carrier and thus would be considered *prima facie* lawful and permitted to take effect on one day’s notice. *See* 47 C.F.R. § 1.773(a)(ii). As such, although the margins for individual contract prices vary, as would be expected under competitive bidding in which bids are submitted in advance based on estimated costs, that variance does not create a basis for determining these rates to be unreasonable or not cost-based. Indeed, forcibly setting a different rate distorts the market and harms consumers. *See Nat’l Ass’n of Telecommunications Officers & Advisors v. Fed. Comm’n Comm’n*, 862 F.3d 18, 25 (D.C. Cir. 2017) (“Rate regulation of a firm in a competitive market harms consumers.”)

The TeleQuality 2018 Interstate Rate Cost Justification (Attachment 2) contains forward-looking estimates of TeleQuality’s costs during the 2018 Funding Year, and thus contains business-sensitive confidential information. Pursuant to Sections 0.457 and 0.459 of the Commission’s rules, 47 C.F.R. §§ 0.457, 0.459, TeleQuality hereby requests confidential treatment of Attachment 2, which should be withheld from public inspection.

In support of this request, TeleQuality hereby states as follows:

**1. Identification of Specific Information for Which Confidential Treatment Is Sought (Section 0.459(b)(1))**

TeleQuality seeks confidential treatment with respect to the TeleQuality 2018 Interstate Rate Cost Justification (the “Confidential Information”). TeleQuality does not seek confidential treatment with respect to the information contained in the TeleQuality 2018 Interstate Rate Sheet.

**2. Description of Circumstances Giving Rise to the Submission (Section 0.459(b)(2))**

TeleQuality is disclosing the Confidential Information pursuant to 47 C.F.R. § 54.607(b)(1). TeleQuality needs to establish some of its rural rates under the Telecommunications Program by submitting those rates to the Commission. As required by the rules, the submission must include “a justification of the proposed rural rate, including an itemization of the costs of providing the requested service.” *Id.*

**3. Explanation of the Degree to Which the Information Is Commercial or Financial, or Contains a Trade Secret or Is Privileged (Section 0.459(b)(3))**

The information in the TeleQuality 2018 Interstate Rate Cost Justification is commercial or financial and contains trade secret information. The justifications for TeleQuality's rates include detailed information regarding the prices TeleQuality pays to its wholesale providers as well as TeleQuality's own costs to serve HCPs. In addition, the Cost Justification includes information about how TeleQuality provisions services to HCPs to meet their unique business needs; this information describes TeleQuality's internal business practices and techniques and is sensitive commercial information.

**4. Explanation of the Degree to Which the Information Concerns a Service that Is Subject to Competition (Section 0.459(b)(4))**

The market for the services at issue is subject to competition; the level of competition varies based on the element of the service and the specific location.

**5. Explanation of How Disclosure of the Information Could Result in Substantial Competitive Harm (Section 0.459(b)(5))**

*First*, disclosure of the information in the response would provide TeleQuality's competitors with sensitive insights related to TeleQuality's services and how it provisions its services to meet its customers' unique needs. Disclosure of this information would allow TeleQuality's competitors to use this information to determine TeleQuality's competitive position and associated revenues and thereby gain a competitive advantage. *Second*, disclosure of TeleQuality's Confidential Information would place TeleQuality at a competitive disadvantage, as TeleQuality lacks the same information regarding its competitors. *Third*, disclosure of the information could damage TeleQuality's relationships with its wholesale providers, to the extent that it has purchased wholesale inputs at rates that are not generally publicly available. *Finally*, disclosure of this information could harm the competitive bidding process in the RHC program.

**6. Identification of Any Measures Taken to Prevent Unauthorized Disclosure (Section 0.459(b)(6))**

The Cost Justification has been kept private and internal to TeleQuality and its parent company. Each page of Attachment 2 is clearly marked "TeleQuality Proprietary – Not for Public Disclosure."

**7. Identification of Whether the Information Is Available to the Public and the Extent of Any Previous Disclosure of the Information to Third Parties (Section 0.459(b)(7))**

TeleQuality has not previously disclosed to third parties, other than its counsel, its parent company, and relevant state commissions any of the information in the Cost Justification.

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**REDACTED—FOR PUBLIC INSPECTION**

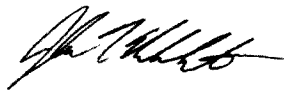
**8. Justification of Period During Which the Submitting Party Asserts that Material Should Not Be Available for Public Disclosure (Section 0.459(b)(8))**

TeleQuality requests that the Cost Justification not be disclosed for 10 years from the date of this request. By that time, the sensitivity of TeleQuality's commercial information will have diminished, as market changes will render it increasingly dated, and would make it difficult for competitors to gauge TeleQuality's current market position and revenues.

\* \* \* \*

Should you have further questions or require additional information in order to grant the requested confidentiality treatment, please contact me immediately so that I can provide further assistance to resolve this matter.

Sincerely,



John T. Nakahata  
*Counsel to TeleQuality Communications, LLC*

Attachs.

Circuit Information	
Circuit Address	402 South Lee Street, Hampton, AR 71744
Billing Account Number	CAB.AR.0014
Speed	1 gb Ethernet
Rate	\$ 8,406.00
Cost Itemization -	
Circuit Costs	\$ [REDACTED]
Transport and Interconnection costs	-
Operating and service delivery costs	[REDACTED]
Working capital	[REDACTED]
Pre-tax cost itemization	[REDACTED]
Federal and State Income Tax	[REDACTED]
Margin	[REDACTED]
Percentage Margin	[REDACTED]

Circuit Information	
Circuit Address	402 South Lee Street, Hampton, AR 71744
Billing Account Number	CAB.AR.0015
Speed	100 mb Ethernet
Rate	\$ 8,375.00
Cost Itemization -	
Circuit Costs	\$ [REDACTED]
Transport and Interconnection costs	-
Operating and service delivery costs	[REDACTED]
Working capital	[REDACTED]
Pre-tax cost itemization	[REDACTED]
Federal and State Income Tax	[REDACTED]
Margin	[REDACTED]
Percentage Margin	[REDACTED]

Circuit Information	
Circuit Address	210 North Main, Amity, AR 71921
Billing Account Number	CAB.AR.0016
Speed	10 mb ethernet
Rate	\$ 4,225.00
Cost Itemization -	
Circuit Costs	\$ [REDACTED]
Transport and Interconnection costs	-
Operating and service delivery costs	[REDACTED]
Working capital	[REDACTED]
Pre-tax cost itemization	[REDACTED]
Federal and State Income Tax	[REDACTED]
Margin	[REDACTED]
Percentage Margin	[REDACTED]

Circuit Information	
Circuit Address	150 North School Street, Bearden, AR 71720
Billing Account Number	CAB.AR.0017
Speed	10 mb ethernet
Rate	\$ 4,225.00
Cost Itemization -	
Circuit Costs	\$ [REDACTED]
Transport and Interconnection costs	-
Operating and service delivery costs	[REDACTED]
Working capital	[REDACTED]
Pre-tax cost itemization	[REDACTED]
Federal and State Income Tax	[REDACTED]
Margin	[REDACTED]
Percentage Margin	[REDACTED]



Circuit Information	
Circuit Address	205 Smith Road, Hope, AR 71801
Billing Account Number	CAB.AR.0018
Speed	10 mb ethernet
Rate	\$ 4,225.00
Cost Itemization -	
Circuit Costs	\$ [REDACTED]
Transport and Interconnection costs	-
Operating and service delivery costs	[REDACTED]
Working capital	[REDACTED]
Pre-tax cost itemization	[REDACTED]
Federal and State Income Tax	[REDACTED]
Margin	[REDACTED]
Percentage Margin	[REDACTED]

Circuit Information	
Circuit Address	1117 Chestnut Street, Lewisville, AR 71845
Billing Account Number	CAB.AR.0019
Speed	10 mb ethernet
Rate	\$ 4,225.00
Cost Itemization -	
Circuit Costs	\$ [REDACTED]
Transport and Interconnection costs	-
Operating and service delivery costs	[REDACTED]
Working capital	[REDACTED]
Pre-tax cost itemization	[REDACTED]
Federal and State Income Tax	[REDACTED]
Margin	[REDACTED]
Percentage Margin	[REDACTED]

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Circuit Information	
Circuit Address	253 South Concord, Strong, AR 71765
Billing Account Number	CAB.AR.0021
Speed	10 mb ethernet
Rate	\$ 4,142.56
Cost Itemization -	
Circuit Costs	\$ [REDACTED]
Transport and Interconnection costs	-
Operating and service delivery costs	[REDACTED]
Working capital	[REDACTED]
Pre-tax cost itemization	[REDACTED]
Federal and State Income Tax	[REDACTED]
Margin	[REDACTED]
Percentage Margin	[REDACTED]

Circuit Information	
Circuit Address	60 May Lane, Burton, WV 26562
Billing Account Number	CBH.WV.0005
Speed	45 mb
Rate	\$ 16,388.00
Cost Itemization -	
Circuit Costs	\$ [REDACTED]
Transport and Interconnection costs	-
Operating and service delivery costs	[REDACTED]
Working capital	[REDACTED]
Pre-tax cost itemization	[REDACTED]
Federal and State Income Tax	[REDACTED]
Margin	[REDACTED]
Percentage Margin	[REDACTED]

Circuit Information	
Circuit Address	5861 Mason Dixon Highway, Blacksville, WV 26521
Billing Account Number	CBH.WV.0006
Speed	45 mb
Rate	\$ [REDACTED]
Cost Itemization -	
Circuit Costs	\$ [REDACTED]
Transport and Interconnection costs	-
Operating and service delivery costs	[REDACTED]
Working capital	[REDACTED]
Pre-tax cost itemization	[REDACTED]
Federal and State Income Tax	[REDACTED]
Margin	[REDACTED]
Percentage Margin	[REDACTED]

Circuit Information	
Circuit Address	307 Chisum Street, Sicily Island, LA 71368
Billing Account Number	CHP.LA.0009
Speed	DS3 - 45 mb
Rate	\$ 8,226.00
Cost Itemization -	
Circuit Costs	
Transport and Interconnection costs	-
Operating and service delivery costs	
Working capital	
Pre-tax cost itemization	
Federal and State Income Tax	
Margin	
Percentage Margin	

Circuit Information	
Circuit Address	307 Chisum Street, Sicily Island, LA 71368
Billing Account Number	CHP.LA.0010
Speed	DS3 - 45 mb
Rate	\$ 8,753.00
Cost Itemization -	
Circuit Costs	
Transport and Interconnection costs	-
Operating and service delivery costs	
Working capital	
Pre-tax cost itemization	
Federal and State Income Tax	
Margin	
Percentage Margin	

Circuit Information	
Circuit Address	710 Chisum Street, Sicily Island, LA 71368
Billing Account Number	CHP.LA.0011
Speed	N x T-1
Rate	\$ 1,584.00
Cost Itemization -	
Circuit Costs	\$ [REDACTED]
Transport and Interconnection costs	-
Operating and service delivery costs	[REDACTED]
Working capital	[REDACTED]
Pre-tax cost itemization	[REDACTED]
Federal and State Income Tax	[REDACTED]
Margin	[REDACTED]
Percentage Margin	[REDACTED]



Circuit Information	
Circuit Address	100 Serio Blvd, Ferriday, LA 71334
Billing Account Number	CHP.LA.0013
Speed	N x T-1
Rate	\$ 1,584.00
Cost Itemization -	
Circuit Costs	\$ [REDACTED]
Transport and Interconnection costs	-
Operating and service delivery costs	[REDACTED]
Working capital	[REDACTED]
Pre-tax cost itemization	[REDACTED]
Federal and State Income Tax	[REDACTED]
Margin	[REDACTED]
Percentage Margin	[REDACTED]

Circuit Information	
Circuit Address	900 Foster Street, Jonesville, LA 71343
Billing Account Number	CHP.LA.0014
Speed	N x T-1
Rate	\$ 1,584.00
Cost Itemization -	
Circuit Costs	\$ [REDACTED]
Transport and Interconnection costs	-
Operating and service delivery costs	[REDACTED]
Working capital	[REDACTED]
Pre-tax cost itemization	[REDACTED]
Federal and State Income Tax	[REDACTED]
Margin	[REDACTED]
Percentage Margin	[REDACTED]

Circuit Information	
Circuit Address	126 Watson, Wisner, LA 71368
Billing Account Number	CHP.LA.0015
Speed	N x T-1
Rate	\$ 2,376.00
Cost Itemization -	
Circuit Costs	\$ [REDACTED]
Transport and Interconnection costs	-
Operating and service delivery costs	[REDACTED]
Working capital	[REDACTED]
Pre-tax cost itemization	[REDACTED]
Federal and State Income Tax	[REDACTED]
Margin	[REDACTED]
Percentage Margin	[REDACTED]

Circuit Information		
Circuit Address	302A Bushley Street, Harrisonburg, LA 71340	
Billing Account Number	CHP.LA.0016	
Speed	N x T-1	
Rate	\$	1,590.00
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs		
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

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<b>Circuit Information</b>	
<b>Circuit Address</b>	307 Chisum Street, Sicily Island, LA 71368
<b>Billing Account Number</b>	CHP.LA.0017
<b>Speed</b>	100 mb Ethernet
<b>Rate</b>	\$ 2,200.00
<b>Cost Itemization -</b>	
<b>Circuit Costs</b>	
<b>Transport and Interconnection costs</b>	-
<b>Operating and service delivery costs</b>	
<b>Working capital</b>	
<b>Pre-tax cost itemization</b>	
<b>Federal and State Income Tax</b>	
<b>Margin</b>	
<b>Percentage Margin</b>	

Circuit Information	
Circuit Address	710 Chisum Street, Sicily Island, LA 71368
Billing Account Number	CHP.LA.0018
Speed	10 mb Ethernet
Rate	\$ 1,262.00
Cost Itemization -	
Circuit Costs	
Transport and Interconnection costs	-
Operating and service delivery costs	
Working capital	
Pre-tax cost itemization	
Federal and State Income Tax	
Margin	
Percentage Margin	

Circuit Information	
Circuit Address	100 Serio Blvd, Ferriday, LA 71334
Billing Account Number	CHP.LA.0019
Speed	10 mb Ethernet
Rate	\$ 1,262.00
Cost Itemization -	
Circuit Costs	
Transport and Interconnection costs	
Operating and service delivery costs	
Working capital	
Pre-tax cost itemization	
Federal and State Income Tax	
Margin	
Percentage Margin	

Circuit Information	
Circuit Address	900 Foster Street, Jonesville, LA 71343
Billing Account Number	CHP.LA.0020
Speed	10 mb Ethernet
Rate	\$ 1,262.00
Cost Itemization -	
Circuit Costs	
Transport and Interconnection costs	-
Operating and service delivery costs	
Working capital	
Pre-tax cost itemization	
Federal and State Income Tax	
Margin	
Percentage Margin	



Circuit Information	
Circuit Address	126 Watson, Wisner, LA 71368
Billing Account Number	CHP.LA.0021
Speed	10 mb Ethernet
Rate	\$ 2,652.00
Cost Itemization -	
Circuit Costs	
Transport and Interconnection costs	-
Operating and service delivery costs	
Working capital	
Pre-tax cost itemization	
Federal and State Income Tax	
Margin	
Percentage Margin	

Circuit Information	
Circuit Address	302A Bushley Street, Harrisonburg, LA 71340
Billing Account Number	CHP.LA.0022
Speed	10 mb Ethernet
Rate	\$ 1,262.00
Cost Itemization -	
Circuit Costs	
Transport and Interconnection costs	-
Operating and service delivery costs	
Working capital	
Pre-tax cost itemization	
Federal and State Income Tax	
Margin	
Percentage Margin	

Circuit Information	
Circuit Address	307 Chisum Street, Sicily Island, LA 71368
Billing Account Number	CHP.LA.0023
Speed	100 mb Ethernet
Rate	\$ 1,900.00
Cost Itemization -	
Circuit Costs	
Transport and Interconnection costs	-
Operating and service delivery costs	
Working capital	
Pre-tax cost itemization	
Federal and State Income Tax	
Margin	
Percentage Margin	

Circuit Information		
Circuit Address	123 McComb Ave, Port Gibson, MS 31950	
Billing Account Number	CLA.MS.0003	
Speed	100 mb Ethernet	
Rate	\$	11,675.00
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs		-
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information		
Circuit Address	178 Highway 24, Centreville, MS 39631	
Billing Account Number	FMH.MS.0015	
Speed	1 gb Ethernet	
Rate	\$	2,621.00
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs		
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information	
Circuit Address	551 Eaker Street, Eden, TX 76837
Billing Account Number	FRO.TX.0001
Speed	45 mb
Rate	\$ 9,446.00
Cost Itemization -	
Circuit Costs	\$ [REDACTED]
Transport and Interconnection costs	-
Operating and service delivery costs	[REDACTED]
Working capital	[REDACTED]
Pre-tax cost itemization	[REDACTED]
Federal and State Income Tax	[REDACTED]
Margin	[REDACTED]
Percentage Margin	[REDACTED]

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Circuit Information	
Circuit Address	216 E College Ave, Mason, TX 76856
Billing Account Number	FRO.TX.0004
Speed	N x T-1
Rate	\$ 2,055.00
Cost Itemization -	
Circuit Costs	\$ [REDACTED]
Transport and Interconnection costs	-
Operating and service delivery costs	[REDACTED]
Working capital	[REDACTED]
Pre-tax cost itemization	[REDACTED]
Federal and State Income Tax	[REDACTED]
Margin	[REDACTED]
Percentage Margin	[REDACTED]

Circuit Information	
Circuit Address	1211 S Bridge Street, Brady, TX 76825
Billing Account Number	FRO.TX.0014
Speed	10 mb Ethernet
Rate	\$ 2,738.00
Cost Itemization -	
Circuit Costs	\$ [REDACTED]
Transport and Interconnection costs	-
Operating and service delivery costs	[REDACTED]
Working capital	[REDACTED]
Pre-tax cost itemization	[REDACTED]
Federal and State Income Tax	[REDACTED]
Margin	[REDACTED]
Percentage Margin	[REDACTED]



**REDACTED—FOR PUBLIC INSPECTION**

<b>Circuit Information</b>	
<b>Circuit Address</b>	<b>29632 Highway 299 East, Round Mountain, CA 96084</b>
<b>Billing Account Number</b>	<b>HCC.CA.0005</b>
<b>Speed</b>	<b>100 mb Ethernet</b>
<b>Rate</b>	<b>\$ 3,995.00</b>
<b>Cost Itemization -</b>	
<b>Circuit Costs</b>	<b>\$ [REDACTED]</b>
<b>Transport and Interconnection costs</b>	<b>-</b>
<b>Operating and service delivery costs</b>	<b>[REDACTED]</b>
<b>Working capital</b>	<b>[REDACTED]</b>
<b>Pre-tax cost itemization</b>	<b>[REDACTED]</b>
<b>Federal and State Income Tax</b>	<b>[REDACTED]</b>
<b>Margin</b>	<b>[REDACTED]</b>
<b>Percentage Margin</b>	<b>[REDACTED]</b>

Circuit Information	
Circuit Address	629 Nuckolls Road, Bolivar, TN 38008
Billing Account Number	HCC.TN.0013
Speed	45mb DS3
Rate	\$ 1,363.00
Cost Itemization -	
Circuit Costs	\$ [REDACTED]
Transport and Interconnection costs	-
Operating and service delivery costs	[REDACTED]
Working capital	[REDACTED]
Pre-tax cost itemization	[REDACTED]
Federal and State Income Tax	[REDACTED]
Margin	[REDACTED]
Percentage Margin	[REDACTED]

Circuit Information	
Circuit Address	629 Nuckolls Road, Bolivar, TN 38008
Billing Account Number	HCC.TN.0014
Speed	45mb DS3
Rate	\$ 2,355.00
Cost Itemization -	
Circuit Costs	\$ [REDACTED]
Transport and Interconnection costs	-
Operating and service delivery costs	[REDACTED]
Working capital	[REDACTED]
Pre-tax cost itemization	[REDACTED]
Federal and State Income Tax	[REDACTED]
Margin	[REDACTED]
Percentage Margin	[REDACTED]

**REDACTED—FOR PUBLIC INSPECTION**

<b>Circuit Information</b>	
<b>Circuit Address</b>	<b>17 First Street East, Staton, TN 38069</b>
<b>Billing Account Number</b>	<b>HCC.TN.0016</b>
<b>Speed</b>	<b>10 mb Ethernet</b>
<b>Rate</b>	<b>\$ 10,680.00</b>
<b>Cost Itemization -</b>	
<b>Circuit Costs</b>	<b>\$ [REDACTED]</b>
<b>Transport and Interconnection costs</b>	<b>-</b>
<b>Operating and service delivery costs</b>	<b>[REDACTED]</b>
<b>Working capital</b>	<b>[REDACTED]</b>
<b>Pre-tax cost itemization</b>	<b>[REDACTED]</b>
<b>Federal and State Income Tax</b>	<b>[REDACTED]</b>
<b>Margin</b>	<b>[REDACTED]</b>
<b>Percentage Margin</b>	<b>[REDACTED]</b>

Circuit Information	
Circuit Address	330 North Main Street, Aberdeen, ID 83210
Billing Account Number	HWI.ID.0016
Speed	100 mb Ethernet
Rate	\$ 1,650.00
Cost Itemization -	
Circuit Costs	\$ [REDACTED]
Transport and Interconnection costs	-
Operating and service delivery costs	[REDACTED]
Working capital	[REDACTED]
Pre-tax cost itemization	[REDACTED]
Federal and State Income Tax	[REDACTED]
Margin	[REDACTED]
Percentage Margin	[REDACTED]

Circuit Information	
Circuit Address	79 North Main Street, Downey, ID 83234
Billing Account Number	HWI.ID.0017
Speed	100 mb Ethernet
Rate	\$ 7,600.00
Cost Itemization -	
Circuit Costs	\$ [REDACTED]
Transport and Interconnection costs	-
Operating and service delivery costs	[REDACTED]
Working capital	[REDACTED]
Pre-tax cost itemization	[REDACTED]
Federal and State Income Tax	[REDACTED]
Margin	[REDACTED]
Percentage Margin	[REDACTED]

REDACTED—FOR PUBLIC INSPECTION

Circuit Information		
Circuit Address	85 South 5th Avenue West, Lava Hot Springs, ID 83246	
Billing Account Number	HWI.ID.0018	
Speed	100 mb Ethernet	
Rate	\$	6,200.00
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs		-
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

REDACTED—FOR PUBLIC INSPECTION

Circuit Information		
Circuit Address	880 W Quinn Rd, Chubbuck, ID 83202	
Billing Account Number	HWI.ID.0019	
Speed	100 mb Ethernet	
Rate	\$	3,500.00
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs		-
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		



Circuit Information	
Circuit Address	655 South 4th Street E, Preston, ID 83263
Billing Account Number	HWI.ID.0020
Speed	100 mb Ethernet
Rate	\$ 7,000.00
Cost Itemization -	
Circuit Costs	\$ [REDACTED]
Transport and Interconnection costs	-
Operating and service delivery costs	[REDACTED]
Working capital	[REDACTED]
Pre-tax cost itemization	[REDACTED]
Federal and State Income Tax	[REDACTED]
Margin	[REDACTED]
Percentage Margin	[REDACTED]

REDACTED—FOR PUBLIC INSPECTION

Circuit Information	
Circuit Address	465 Memorial Drive, Pocatello, ID 83204
Billing Account Number	HWI.ID.0021
Speed	100 mb Ethernet
Rate	\$ 4,500.00
Cost Itemization -	
Circuit Costs	\$ [REDACTED]
Transport and Interconnection costs	-
Operating and service delivery costs	[REDACTED]
Working capital	[REDACTED]
Pre-tax cost itemization	[REDACTED]
Federal and State Income Tax	[REDACTED]
Margin	[REDACTED]
Percentage Margin	[REDACTED]

Circuit Information	
Circuit Address	1000 North 8th Avenue, Pocatello, ID 83201
Billing Account Number	HWI.ID.0022
Speed	100 mb Ethernet
Rate	\$ 3,600.00
Cost Itemization -	
Circuit Costs	\$ [REDACTED]
Transport and Interconnection costs	-
Operating and service delivery costs	[REDACTED]
Working capital	[REDACTED]
Pre-tax cost itemization	[REDACTED]
Federal and State Income Tax	[REDACTED]
Margin	[REDACTED]
Percentage Margin	[REDACTED]

Circuit Information	
Circuit Address	832 Reed Street, American Falls, ID 83211
Billing Account Number	HWI.ID.0024
Speed	N x T-1
Rate	\$ 500.00
Cost Itemization -	
Circuit Costs	\$ [REDACTED]
Transport and Interconnection costs	-
Operating and service delivery costs	[REDACTED]
Working capital	[REDACTED]
Pre-tax cost itemization	[REDACTED]
Federal and State Income Tax	[REDACTED]
Margin	[REDACTED]
Percentage Margin	[REDACTED]

Circuit Information	
Circuit Address	330 North Main Street, Aberdeen, ID 83210
Billing Account Number	HWI.ID.0025
Speed	N x T-1
Rate	\$ 1,200.00
Cost Itemization -	
Circuit Costs	\$ [REDACTED]
Transport and Interconnection costs	-
Operating and service delivery costs	[REDACTED]
Working capital	[REDACTED]
Pre-tax cost itemization	[REDACTED]
Federal and State Income Tax	[REDACTED]
Margin	[REDACTED]
Percentage Margin	[REDACTED]

Circuit Information	
Circuit Address	465 Memorial Drive, Pocatello, ID 83204
Billing Account Number	HWI.ID.0030
Speed	N x T-1
Rate	\$ 500.00
Cost Itemization -	
Circuit Costs	\$ [REDACTED]
Transport and Interconnection costs	-
Operating and service delivery costs	[REDACTED]
Working capital	[REDACTED]
Pre-tax cost itemization	[REDACTED]
Federal and State Income Tax	[REDACTED]
Margin	[REDACTED]
Percentage Margin	[REDACTED]

Circuit Information	
Circuit Address	823 Reed Street, American Falls, ID 83211
Billing Account Number	HWI.ID.0033
Speed	1 gb Ethernet
Rate	\$ 15,100.00
Cost Itemization -	
Circuit Costs	\$ [REDACTED]
Transport and Interconnection costs	-
Operating and service delivery costs	[REDACTED]
Working capital	[REDACTED]
Pre-tax cost itemization	[REDACTED]
Federal and State Income Tax	[REDACTED]
Margin	[REDACTED]
Percentage Margin	[REDACTED]

Circuit Information	
Circuit Address	823 Reed Street, American Falls, ID 83211
Billing Account Number	HWI.ID.0034
Speed	1 gb Ethernet
Rate	\$ 12,508.00
Cost Itemization -	
Circuit Costs	\$ [REDACTED]
Transport and Interconnection costs	-
Operating and service delivery costs	[REDACTED]
Working capital	[REDACTED]
Pre-tax cost itemization	[REDACTED]
Federal and State Income Tax	[REDACTED]
Margin	[REDACTED]
Percentage Margin	[REDACTED]



Circuit Information	
Circuit Address	500 S. 11th Avenue, Pocatello, ID 83201
Billing Account Number	HWI.ID.0035
Speed	1 gb Ethernet
Rate	\$ 15,194.00
Cost Itemization -	
Circuit Costs	\$ [REDACTED]
Transport and Interconnection costs	-
Operating and service delivery costs	[REDACTED]
Working capital	[REDACTED]
Pre-tax cost itemization	[REDACTED]
Federal and State Income Tax	[REDACTED]
Margin	[REDACTED]
Percentage Margin	[REDACTED]

Circuit Information		
Circuit Address	149 Staunton Drive, Weston, WV 26452	
Billing Account Number	CWV.WV.0001	
Speed	1 gb Ethernet	
Rate	\$	7,092.80
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs	-	
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		