



1300 NORTH 17th STREET, 11th FLOOR
ARLINGTON, VIRGINIA 22209

OFFICE: (703) 812-0400
FAX: (703) 812-0486
www.fhhlaw.com
www.commlawblog.com

June 20, 2018

VIA ECFS

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, N.W.
Washington, DC 20554

Re: Iowa Network Services, Inc. d/b/a Aureon Network Services
In re Iowa Network Access Division Tariff F.C.C. No. 1
WC Docket No. 18-60; Transmittal No. 36

Dear Ms. Dortch:

On behalf of Iowa Network Services, Inc. d/b/a Aureon Network Services (“Aureon”), and pursuant to ex parte discussions with Commission staff as disclosed on June 19, 2018, this letter provides Aureon’s consent to reclassify as public certain information that Aureon had previously designated as confidential in the above-referenced proceeding. Except as provided herein, all other aspects of Aureon’s filings with the Commission designated as “Confidential,” including, but not limited to, Aureon’s rate calculations and spreadsheets, shall remain confidential. Aureon redesignates as “Public” the following specific information filed with the Commission:

- 1) Fully Distributed Cost: The amount of the Network Division’s fully distributed cost allocated to centralized equal access (“CEA”) service shown in Attachment 4 to Aureon’s Direct Case, and in other pleadings and documents filed in this proceeding, i.e., \$18,651,592.
- 2) Rate of Return: The 10.5% rate of return used in Aureon Exhibit D, Attachments 2 and 4 of the Direct Case, and Attachment 5 of the Rebuttal.
- 3) Aureon’s Annual Average Weighted Miles: The following average transport miles weighted by minutes of use for Aureon that was filed with the Commission on May 25, 2018:

2016: 112.043 miles
2017: 103.519 miles

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- 4) Methodology Used in Aureon's Rate Development Calculation: The methodologies and descriptions, and the merits thereof, related to Aureon's rate development and cost justification calculations, such as the use of DS-1 vs. DS-3 circuits, and the use of the Circuit vs. System method for allocating costs. For the avoidance of doubt, no specific data, examples, numbers, or data belonging to or provided by Aureon, or used in Aureon's calculations, are redesignated as Public, and remain Confidential. Furthermore, any discussion of or comparisons to the rates or terms of the non-regulated services provided by Aureon's Network Division remain confidential.

Should there be any questions with respect to this matter, please feel free to contact us at (703) 812-0400.

Sincerely,

/s/ James U. Troup

James U. Troup
Tony S. Lee

Counsel for Iowa Network Services, Inc.
d/b/a Aureon Network Services.