



REDACTED – FOR PUBLIC INSPECTION

7852 Walker Drive, Suite 200
Greenbelt, Maryland 20770
phone: 301-459-7590, fax: 301-577-5575
internet: www.jsitel.com, e-mail: jsi@jsitel.com

September 27, 2012

FILED/ACCEPTED

By Hand Delivery

SEP 27 2012

Federal Communications Commission
Office of the Secretary

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

**Re: WC Docket No. 12-233
WCB/Pricing No. 12-09
Direct Case of Chester Telephone Company d/b/a TruVista Communications**

Dear Ms. Dortch:

John Staurulakis, Inc. hereby files the attached Direct Case on behalf of Chester Telephone Company d/b/a TruVista Communications pursuant to the Commission's *Order Designating Issues for Investigation*, DA 12-1430, released August 31, 2012 in the above-referenced docket. The Direct Case is filed as confidential under the Commission's Protective Order.¹ Pursuant to the Protective Order, provided are one copy of the confidential version and two copies of the redacted version. The redacted version has also been filed on the Electronic Comment Filing System.

Please direct any questions regarding this filing to the undersigned.

Sincerely,

John Kuykendall
Vice President
301-459-7590
jkuykendall@jsitel.com

Attachment

cc: Robin Cohn, Pricing Policy Division, via email.

No. of Copies rec'd 0+1
List ABCDE

¹ See *In the Matter of Investigation of Certain 2012 Annual Access Tariffs*, WC Docket No. 12-233, WCB/Pricing File No. 12-09, Protective Order, DA 12-1518, rel. Sept. 21, 2012.

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FILED/ACCEPTED

SEP 27 2012

Federal Communications Commission
Office of the Secretary

In the Matter of)
) WC Docket No. 12-233
Investigation of Certain 2012 Annual)
Access Tariffs) WCB/Pricing No. 12-09
)

**DIRECT CASE OF
CHESTER TELEPHONE COMPANY
D/B/A TRUVISTA COMMUNICATIONS**

Chester Telephone Company d/b/a TruVista Communications, (“Chester”) pursuant to the August 31, 2012 Designation Order,¹ hereby files its Direct Case in the above-referenced matter.

I. INTRODUCTION

On June 18, 2012, Chester Telephone Company d/b/a TruVista Communications, (alternatively “Chester” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) filed under Transmittal No. 165 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”) revisions in accordance with the Commission’s March 28, 2012 release entitled In the Matter of July 3, 2012 Annual Access Charge Tariff Filings, WCB/Pricing File No. 12-07, Order, DA 12-482 (“June 18th filing”). Chester is an Issuing Carrier of the JSI Tariff.

Chester elected to file an Access Recovery Charge (“ARC”) pursuant to Section 51.917(e), to be effective July 3, 2012, and a Connect America Fund (“CAF”) election pursuant to Section 51.917(f). The Company made the appropriate filing on June 18, 2012. On July 2, 2012, the Wireline Competition Bureau released an Order that

¹ Investigation of Certain 2012 Annual Access Tariffs, WC Docket No. 12-233, WCB/Pricing No. 12-09, Order Designating Issues for Investigation, DA 12-1430 (rel. August 31, 2012) (“Designation Order”).

suspended for one day and set for investigation the ARC rates contained in the 2012 Annual Access Tariff filings of all issuing incumbent local exchange carriers (“ILECs”) that charged an ARC, including those filed on behalf of Chester. Pursuant to the *Designation Order*, Chester hereby submits the required information and demonstrates that in light of the adjustments discussed in this Direct Case, Chester’s ARC rates are just and reasonable.

The financial information presented in this Direct Case as Exhibit 1, the 2012 ROR ILEC Interstate Rates Worksheet and the 2012 ROR ILEC Intrastate Rates Worksheet,² is confidential and is being submitted with this Direct Case in both confidential and redacted versions. Although Chester is not re-filing its financial information in conjunction with this Direct Case, Chester has in fact filed a revised Tariff Review Plan with the Commission, subsequent to the June 18th filing, in order to address issues raised by Commission Staff. This filing was submitted as an amendment to JSI Tariff Transmittal No. 165. Accordingly, and in an abundance of caution, Chester is also filing the appropriate certifications with this Direct Case indicating that this revised financial information is true and correct to the best of its knowledge, that it was not seeking duplicative recovery, and that it complied with sections 51.917(d), 51.917(e), and 51.917(f) of the Commission’s rules.³ These certifications are being filed in support of the revised Tariff Review Plan that was previously filed with the Commission.

² Also referred to as the Tariff Review Plan or financial information.

³ See 47 C.F.R. §§ 1.16 (addressing unsworn declarations under penalty of perjury in lieu of affidavits); 51.917(d)(1)(vii) (requiring annual certification from Rate-of-Return carriers obtaining Eligible Recovery that no duplicative recovery is sought); and 51.917(f)(3) (stating that “A Rate-of-Return carrier that elects to receive CAF ICC support must certify with its 2012 annual access tariff filing and on April 1st of each subsequent year that it has complied with paragraphs (d) and (e), and, after doing so, is eligible to receive the CAF ICC support requested pursuant to paragraph (f) of this section”).

II. ISSUES DESIGNATED FOR INVESTIGATION

A. Whether LEC has Reasonably Determined the Amount of its Base Period Revenue

1. Fiscal Year 2011 Revenue Determinations

A rate-of-return Local Exchange Carrier's ("LEC's") Base Period revenue is made up of three components: 1) its 2011 Interstate Switched Access Revenue Requirement; 2) Fiscal Year 2011 revenues from rate elements included in the definition of Transitional Intrastate Access Service received by March 31, 2012; and 3) Fiscal Year 2011 reciprocal compensation revenues received by March 31, 2012, less Fiscal Year 2011 reciprocal compensation payments made by March 31, 2012 (net reciprocal compensation revenues). Base Period Revenue also includes revenues from non-recurring charges associated with the switched access services in question.

Chester bills its carrier access bills ("CABs") on a calendar month cycle. Consequently, intrastate terminating billing usage reflected in the June 18th filing for Chester was based on the time period from October 1, 2010 through September 30, 2011, which is the Fiscal Year put forth by the Commission. The CABs are used to ensure that the revenues are for services provided during Fiscal Year 2011, eliminate billed revenues not related to services provided such as late fees which are identified separately on the CABs and to make certain that billed revenues were collected by March 31, 2012. Accordingly, no adjustment to the intrastate terminating billing usage is required at this time.

2. Non-recurring charges inclusions and eliminations

Chester does not have any non-recurring charges associated with the services in question. As a result, Base Period Revenue is not impacted by non-recurring

charges. Non-recurring charges not related to these services were also excluded from the billed revenues used in the June 18th filing and in this Direct Case.

B. Whether LEC has Reasonably Calculated its Required Intrastate Rate Reductions

Chester has followed the appropriate procedure when determining its required intrastate rate reductions for the purposes of the June 18th filing, and for this Direct Case, and is not subject to review of this issue as outlined in the Commission's *Designation Order*.

C. Whether LEC has Reasonably Estimated its Projected Interstate and Intrastate Switched Access Demand

LECs were directed to use existing demand estimation methods to project demand for the 2012-2013 tariff period. In calculating the Eligible Recovery, a LEC must also subtract certain projected intrastate and interstate access revenues from its Base Period.

Please reference Exhibit 1. As indicated on the 2012 ROR ILEC Interstate Rates Worksheet, the LSS amount reflected in cell F-7 is [REDACTED] and the projected annual percentage rate of demand change reflected in the calculation of the amount in cell F-10 is -5.11 percent. As indicated on the 2012 ROR ILEC Intrastate Rates Worksheet, the projected annual percentage rate of demand change reflected in the calculation of the amount in cell G-9 is -6.67 percent. This review indicates that Chester's projected interstate and/or intrastate demand loss is less than an annualized rate of fifteen percent. Accordingly, Chester falls within the "safe harbor" of fifteen percent and no further action is warranted.

D. Whether NECA's Allocation of Projected Pool Interstate Switched Access Revenues Based on Projected Switched Access Billed Revenues was Reasonable

Not applicable to Chester Telephone Company d/b/a TruVista Communications.

E. Whether the Suspended Access Recovery Charge Rates are Just and Reasonable and, if not, the Process for Requiring Refunds

Please reference Exhibit 2 which is a Table reflecting Chester's filed ARC rates and the ARC rates supported by this Direct Case. In this Direct Case, Chester reaffirms the ARC rates that were established in the June 18th filing and asserts that the ARC rates established in the June 18th filing were just and reasonable. Chester is also filing Exhibit 3 with this Direct Case, which is the completed Tariff Review Plan showing the calculation of its ARC rates. In light of the fact that no changes are being proposed to the ARC rates calculations, this Tariff Review Plan will not be re-filed and Chester will not be filing revised ARC rates with the Commission in conjunction with this Direct Case.

III. CONCLUSION

Chester presents this Direct Case in compliance with the aforementioned August 31, 2012 Designation Order. Chester has reasonably determined the amount of its Base Period Revenue, reasonably calculated its required intrastate rate reductions, and reasonably estimated its projected interstate and intrastate switched access demand.

Accordingly, and in light of the adjustments described in this Direct Case, Chester's suspended ARC rates are just and reasonable and are reaffirmed by this Direct Case.

Respectfully submitted,

September 27, 2012

Chester Telephone Company
d/b/a TruVista Communications

/s/ Thomas T. Harper

Thomas T. Harper
Vice President-Administration & Regulatory
Affairs
112 York Street
P.O. Box 160
Chester, South Carolina 29706

REDACTED FOR PUBLIC INSPECTION

EXHIBIT 1

- 2012 ROR ILEC Interstate Rates Worksheet
- 2012 ROR ILEC Intrastate Rates Worksheet

	A	B	C	D	E	F	G	H
1	Filing Date:		18-Jun-12					
2	Filing Entity:		TruVista Communications Inc. d/b/a Chester Telephone Company					
3	Transmittal Number:		165					
4	COSA:		240516					
5								
6								
7	Most Recently Filed Interstate Switched Access Revenue Requirement					Input		
8	TY 2012-2013 Baseline Adjustment Factor (BAF)						0.95	
9	BAF X Most Recently Filed Interstate Switched Access Revenue Requirement					F7*F8		
10	Total TY 2012-2013 Expected Maximum Interstate Revenue					Sum of Col. H		
11	TY 2012-2013 Interstate Eligible Recovery					F9-F10		
12								
13								
14	Interstate Tariff Section	USOC	Interstate Switched Access Rate Element	Unit of Demand (e.g., MOU or DS1)	12/29/11 Interstate Rate	7/1/2012 Proposed Rate		
15	Input	Input	Input (Note 1)	Input	Input	Input		
16	** LOCAL SWITCHING **							
17	17.2.3 (A)		Local Switching Premium	MOU	0.00989			
18								
19								
20								
21								
22	** INFORMATION **							
23	17.2.3 (B)		Information Surcharge Premium	MOU	0.0185			
24								
25								
26								
27								
28	** TANDEM-SWITCHED TRANSPORT AND TANDEM **							
29	17.2.2		Tandem Switched Facility	MOU per Mile		0.000159		
30	17.2.2		Tandem Switched Termination	MOU per Term		0.000828		
31	17.2.2		Tandem Switching	MOU per Tand		0.001727		
32								
33								
34	** SIGNALING FOR TANDEM SWITCHING **							
35								
36								
37								
38								
39								
40	** DIRECT-TRUNKED TRANSPORT **							
41	17.2.2		Direct Trunked Facility	DS1 per Mile		9.2		
42	17.2.2		Direct Trunked Termination	DS1 per Term		47.72		
43								
44								
45								
46	** DEDICATED SIGNALING TRANSPORT **							
47	17.2.2 (A)(2)		STP Port	per Port	244	244		
48								
49								
50								
51								
52	** ENTRANCE FACILITIES **							
53	17.2.2		Entrance Facility	DS1 per Term		134.25		
54								
55								
56								
57								
58	** LINE INFORMATION DATABASE **							
59	17.2.2		800 Series Data Base Access Service - Basic	per Query	0.0029	0.0029		
60	17.2.2		800 Series Data Base Access Service - Vertical Feature	per Query	0.0032	0.0032		
61								
62								
63								
64	** BILLING NAME AND ADDRESS **							
65								
66								
67								
68								
69								
70								
71	Total TY 2012-2013 Expected Maximum Interstate Revenue (Sum of Col. H)							
72								
73								
74	Note 1: Enter one rate element per line under the relevant category. Insert rows as necessary.							

A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S
1	Filing Date:	18-Jun-12																
2	Filing Entity:	TruVista Communications Inc d/b/a Chester Telephone Company																
3	Transmittal Number:	165																
4	COSA:	240516																
5																		
6																		
7	Total FY 2011 Actual Revenue for Transitional Intrastate Access Service Rate Elements							Sum of Col. O										
8	95% of Total FY 2011 Actual Revenue for Transitional Intrastate Access Service Rate Elements							Sum of Col. P										
9	Total TY 2012-2013 Expected Maximum Transitional Intrastate Access Service Revenue							Sum of Col. R										
10	Total TY 2012-2013 Intrastate Eligible Recovery							Sum of Col. S										
11																		
12																		
13	Intrastate Tariff Section	Interstate Tariff Section	USOC	Intrastate and Interstate Switched Access Rate Elements for Transitional Intrastate Access Service Categories	Unit of Demand [e.g., MOU or DS1]	12/29/2011 Intrastate Rate	12/29/2011 Interstate Rate											
14	Input	Input	Input	Input (Note 1)	Input	Input	Input											
15				** TERMINATING END OFFICE ACCESS SERVICE **														
16				Terminating Carrier Common Line														
17																		
18																		
19																		
20																		
21																		
22				Terminating Local Switching														
23																		
24	17.2.3 (A)	17.2.3 (A)		Local Switching - Terminating	mou	0.007779	0.00989000											
25																		
26																		
27																		
28				Terminating Other [e.g., information surcharge, Transport or Residual Interconnection Charges]														
29																		
30				SC Interim LEC Fund Bulk-Billed Access - Terminating Portion	billed monthly													
31	17.2.3 (B)	17.2.3 (B)		Information Surcharge - Terminating	mou	0.000374	0.00018500											
32																		
33																		
34				** TERMINATING TANDEM-SWITCHED TRANSPORT ACCESS SERVICE **														
35				Terminating Tandem-Switched Common Transport														
36	17.2.2			Local Transport Facility - Terminating (avg miles w/BIP = 23.37)	mou x miles	0.0009348												
37	17.2.2			Local Transport Termination - Terminating	mou	0.00036												
38		17.2.2		Tandem Switched Facility (avg miles w/BIP = 1.87)	mou x miles		0.000159											
39		17.2.2		Tandem Switched Termination (avg terminations = 1.33)	mou x terms		0.000828											
40		17.2.2		Tandem Switching (84% of LS mou)	mou		0.001727											
41				Terminating Tandem Switching														
42																		
43																		
44																		
45																		
46																		
47				** ORIGINATING AND TERMINATING DEDICATED TRANSPORT ACCESS SERVICE **														
48				Originating and Terminating Entrance Facilities														
49																		
50																		
51																		
52																		
53				Originating and Terminating Tandem-Switched Dedicated Transport														
54																		
55																		
56																		
57																		
58																		
59																		
60				Originating and Terminating Direct-Trunked Transport														
61																		
62		17.2.2		Direct Trunk Facility	DS-1		9.20											
63		17.2.2		Direct Trunk Termination	DS-1		47.72											
64		17.2.2		Direct Trunk Facility	DS-3		80.12											
65		17.2.2		Direct Trunk Termination	DS-3		306.45											
66																		
67	Total																	
68																		
69																		
70	Note 1: Enter one rate element per line under the relevant category. Insert rows as necessary.																	

REDACTED FOR PUBLIC INSPECTION

EXHIBIT 2

Initial ARC Rate and Direct Case ARC Rate Comparison Table

REDACTED FOR PUBLIC INSPECTION

**CHESTER TELEPHONE COMPANY
D/B/A TRUVISTA COMMUNICATIONS**

Exhibit 2

Initial ARC Rate and Direct Case ARC Rate Comparison Table

	Initial ARC Rate	Direct Case ARC Rate
Primary Residential or Single Line Business End User Common Line Charge	\$0.50	\$0.50
Multi-Line Business End User Common Line Charge	\$1.00	\$1.00

Excludes Lifeline Customers

REDACTED FOR PUBLIC INSPECTION

EXHIBIT 3

Tariff Review Plan

Calculation of ARC Rates

REDACTED VERSION FOR PUBLIC REVIEW

Filing Date (enter w/leading '):
 Holding Company:
 Filing Name:

6/18/2012
 TruVista Communications Inc. d/b/a Chester Telephone Company
 Chester Telephone Company

ARCCTRP-CAF-1

Study Area EXCHANGES

Rate Ceiling Component Charges Calculation (51 915(b)(11))										
RESIDENCE / NP / BRI / SLB (excluding Lifeline)										
Study Area	EXCHANGES	Stand-alone R1 rate	Mandatory EAS	Mandatory		E911	TRS	State USF	Federal SLC	Total Rate Ceiling Comp. Chgs
				Zone Charges	State SLC					
240516	Chester	\$ 13.95	\$ -	\$ -	\$ -	\$1.00	\$0.15	\$0.35	\$6.50	\$21.95
240516	Great Falls	\$ 13.95	\$ -	\$ -	\$ -	\$1.00	\$0.15	\$0.35	\$6.50	\$21.95
240516	Lewisville	\$ 13.95	\$ -	\$ -	\$ -	\$1.00	\$0.15	\$0.35	\$6.50	\$21.95

MULTI-LINE BUSINESS

Federal
 SLC-MLB
 \$ 9.20
 \$ 9.20
 \$ 9.20

REDACTED VERSION FOR PUBLIC REVIEW

Filing Date (enter w/leading '):
 Holding Company:
 Filing Name:

6/18/2012
 TruVista Communications Inc d/b/a Chester Telephone Company
 Chester Telephone Company

ARCRTRP-CAF-2

Eligible Revenue - Current Yr Recovery
 Maximum Imputed ARC Revenue
 Tariffed ARC Revenue
 Expected CAF ICC Support

\$ 1,037,137

Eligible Revenue - Current Yr Recovery
 Tariffed ARC Revenue + Expected CAF ICC Support

Residential Rate Ceiling (51 915(b)(12)) \$ 30 00
 Maximum MLB SLC+ARC (51 915(e)(5)(iv)) \$ 12 20
 Max ARC for current year Res/SLB \$ 0 50
 Max ARC for current year MLB \$ 1 00

Totals



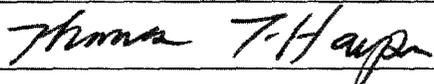
Exchange/RG	RESIDENCE / NP / BRI / SLB (excluding Lifeline)				MULTI-LINE BUSINESS			
	Residential Total Rate Ceiling Chgs	RES/NP/BRI Current Year Maximum ARC Rate	Tariffed ARC Rate	SLB Tariffed ARC Rate	MLB Federal SLC	MLB Curr Yr Maximum ARC Rate	NonCentrex Tariffed ARC Rate	Centrex Tariffed ARC Rate
Chester	\$ 21 95	\$ 0 50	\$ 0 50	\$ 0 50	\$ 9 20	\$ 1 00	\$ 1 00	\$ 1 00
Great Falls	\$ 21 95	\$ 0 50	\$ 0 50	\$ 0 50	\$ 9 20	\$ 1 00	\$ 1 00	\$ 1 00
Lewisville	\$ 21 95	\$ 0 50	\$ 0 50	\$ 0 50	\$ 9 20	\$ 1 00	\$ 1 00	\$ 1 00

**Certification of Officer
to Authorize an Agent to File Data on Behalf of Reporting Carrier**

I certify that (Name of Agent) John Staurulakis, Inc. (JSI) is authorized to submit information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the data provided to the Authorized Agent; and, to the best of my knowledge, the actual data provided to the Authorized Agent are accurate.

Name of Authorized Agent John Staurulakis, Inc. (JSI)

Name of Reporting Carrier **Chester Telephone Company**

Signature of Authorized Officer		Date	September 21, 2012
---------------------------------	--	------	--------------------

Printed name of Authorized Officer Thomas T. Harper

Title or position of Authorized Officer Vice President-Administration & Regulatory Affairs

Telephone number or Authorized Officer. (803) 581-9164 ext. _ _ _ _

Study Area Code of Reporting Carrier	240516		Filing Due Date for this form (mm/dd/yyyy)	09/27/2012	
--------------------------------------	---------------	---	---	------------	---

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.

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 **Chester Telephone Company**

Signature of Authorized Officer *Thomas T. Harper* Date
September 21, 2012

Printed name of Authorized Officer **Thomas T. Harper**

Title or position of Authorized Officer **Vice President-Administration & Regulatory Affairs**

Telephone number of Authorized Officer. **(803) 581-9164 ext. _ _ _ _**

Study Area Code of Reporting Carrier	240516		Filing Due Date for this form (mm/dd/yyyy)	09/27/2012
--------------------------------------	---------------	---	---	-------------------

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.

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		Chester Telephone Company	
Signature of Authorized Officer	<i>Thomas T Harper</i>	Date	September 21, 2012
Printed name of Authorized Officer	Thomas T. Harper		
Title or position of Authorized Officer	Vice President-Administration & Regulatory Affairs		
Telephone number of Authorized Officer.	(803) 581-9164 ext. _ _ _ _		
Study Area Code of Reporting Carrier	240516	Filing Due Date for this form (mm/dd/yyyy)	09/27/2012

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.

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).

Name of Reporting Carrier **Chester Telephone Company**

Signature of Authorized Officer <i>Thomas T. Harper</i>	Date September 21, 2012
---	----------------------------

Printed name of Authorized Officer **Thomas T. Harper**

Title or position of Authorized Officer **Vice President-Administration & Regulatory Affairs**

Telephone number or Authorized Officer. **(803) 581-9164 ext. _ _ _ _**

Study Area Code of Reporting Carrier	240516	Filing Due Date for this form (mm/dd/yyyy)	09/27/2012
--------------------------------------	---------------	---	-------------------

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.