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October 17, 2012

Via ECFS

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street S.W.
Room TW-A325
Washington, D.C. 20554

RE: Amendment to Description and Justification for Flat Rock Telephone Company, in association with the Direct Case Filing pursuant to WC Docket No. 12-233, WCB/Pricing No. 12-09

Dear Secretary Dortch:

On behalf of Flat Rock Telephone Company ("Flat Rock"), enclosed for filing is an amended Description and Justification. This amended Description and Justification is being filed as requested by Staff, to provide additional explanation and clarification of the revenue calculation Egyptian and Flat Rock.

As indicated on page 3, paragraph 4 of the amended Description & Justification, baseline revenue amounts were calculated using access rates and demand. Using this methodology, charges for late payments and/or billed revenues not related to services provided on accounts were not a part of the initial revenue data and therefore, did not need to be adjusted for in the FY2011 total. To further clarify, non-service related demand or rates were not included in the revenue calculation, therefore no non-service revenue adjustments are necessary.

All correspondence and inquiries concerning this transmittal should be addressed to Nicole Stephens at 3220 Pleasant Run, Springfield, IL 62711, or phone at (217) 698-2700.

GVNW Consulting, Inc.

By: Nicole Stephens

Electronic Attachments:

Amended Description & Justification

GVNW Inc. / Management

TARIFF F.C.C. NO. 2 (ACCESS SERVICE)

**AMENDED TRANSMITTAL NO. 215
DIRECT CASE FILING, WC DOCKET NO. 12-233**

ISSUED: September 27, 2012

EFFECTIVE: July 3, 2012

REVISED DESCRIPTION & JUSTIFICATION

Introduction

The Commission, in its Order Designating Issues for Investigation DA 12-1430 dated August 31, 2012, requested a revised Description and Justification for the July 3, Annual Access Charge Tariff Filing made by GVNW Consulting, Inc. (“GVNW”) on behalf of its issuing carriers included in GVNW Inc. / Management Tariff F.C.C. No. 2, pursuant to WCB/Pricing File No. 12-07 and FCC Order DA 12-482.

The two issuing carriers, Egyptian Telephone Cooperative Associations (“Egyptian”) and Flat Rock Telephone Company (“Flat Rock”), are small local exchange carriers which serve less than 50,000 access lines and are subset 3 carriers as defined by FCC Part 69.602. Egyptian and Flat Rock are rate-of-return ILEC’s that file under Part 61.39 of the Commission’s rules. Egyptian and Flat Rock would not, absent requirements adopted in the *USF/ICC Transformation Order*, have been required to file annual access charge tariffs this year, since they file revisions in odd-numbered years. However, pursuant to the *USF/ICC Transformation Order*, rate-of-return ILEC’s subject to Part 61.39 of the Commission’s rules that choose to charge their end user customers an Access Recovery Charge (“ARC”) must file a revised tariff that includes the ARC rates. The ILEC’s must also file a Tariff Review Plan (“TRP”) with the requisite supporting material to justify the ARC rates.

Revised Tariff

Egyptian and Flat Rock did not file any revisions to existing interstate switched and special access rates with their filing. However, both Egyptian and Flat Rock filed an ARC for each of

their respective exchanges and are filing TRP's as required to support and justify the ARC rates filed.

Process for Determining Revenues from Services Provided During Fiscal Year 2011 (FY2011)

Egyptian and Flat Rock's access billing systems are based on call records that include information indicating the jurisdiction, call direction, usage date and duration. This information is summarized in a method that is appropriate for calculating access revenues based on the structure of the applicable tariff rates.

Egyptian and Flat Rock' access bill cycles are not calendar month. To calculate the true Fiscal Year 2011 demand, the data from the billing cycles that include usage for the periods before October 1, 2010 and after September 30, 2011 were prorated based on the number of days outside and inside of FY2011. The prorated data outside FY2011 were subtracted from the total demand from the bill cycles that spanned FY2011.

An analysis of any unpaid balances on access customer accounts as of March 31, 2012 was conducted and the demand associated with unpaid amounts pertaining to FY2011 were netted against the demand calculated per the preceding paragraph.

Baseline revenue amounts were calculated using access rates and demand. Using this methodology, charges for late payment and/or billed revenues not related to services provided on accounts were not a part of the initial revenue data and therefore, did not need to be adjusted for in the FY2011 total. To further clarify, non-service related demand or rates were not included in the revenue calculation, therefore no non-service revenue adjustments are necessary.

Non-recurring rates and demand were not included in the original TRP. That omission has been corrected in the revised TRP's being submitted.

Local Switching Support Included in Interstate Switched Access Revenue Requirement

Per direction in paragraph 19 of the FCC Order in WC Docket No. 12-233 dated August 31, 2012, the Local Switching Support included in the interstate switched access revenue requirement (cell F7 of the 2012 RoR ILEC Interstate Rates Worksheet) in the TRP for Egyptian and Flat Rock are \$489,907 and \$79,827 respectively.

Switched Access Projected Demand

Historical access demand data was analyzed and projected demand changes for the Egyptian and Flat Rock were determined based on that analysis. The projected annual interstate and intrastate demand changes for Egyptian are -11% and -12% respectively. The projected annual interstate and intrastate demand changes for Flat Rock are +1.5% and -9% respectively.

Tariff Review Plans (TRPs)

Revised TRPs are being filed by the both Egyptian and Flat Rock pursuant to Material to be Filed in Support of 2012 Annual Access Tariff Filings, WCB/Pricing File No. 12-08, Order DA 12-575. As the Order states, the completion of the TRPs appended to this Order provides the supporting documentation to fulfill the requirements established in Parts 51.700 through 51.715, and 51.901 through 51.919 of the Commission's rules.

The following files containing the revised TRP schedules are included with this filing as required:

Egyptian TRP - RateCeiling-CAF – 9-25-12

Egyptian TRP - RoR-ILEC-ICC-data – 9-25-12

Egyptian TRP - Tariff-Rate-Comparison_CAF – 9-25-12

Flat Rock TRP - RateCeiling-CAF – 9-25-12

Flat Rock TRP - RoR-ILEC-ICC-data – 9-25-12

Flat Rock TRP - Tariff-Rate-Comparison_CAF – 9-25-12

Since Egyptian and Flat Rock are rate-of-return carriers subject to Part 61.39, and filed their own annual switched access tariffs in 2011, both carriers believe that their 2011 Interstate Switched Access Revenue Requirements are correctly calculated pursuant to Part 51.917(b) of the Commission's rules. Both Egyptian and Flat Rock also believe that their 2011 Rate-of-Return Carrier Base Period Revenue is correctly calculated pursuant to Part 51.917(c) of the Commission's rules. Egyptian and Flat Rock have submitted all the required Rate Ceiling Component Charges. Egyptian and Flat Rock have submitted all the required interstate, intrastate and reciprocal compensation rate and demand information. Therefore, given all of the above, both Egyptian and Flat Rock's TRP's should correctly reflect their Eligible Recovery pursuant to Part 51.917(d), its ARC rates pursuant to part 51.917(e), and its eligibility for CAF ICC Recovery pursuant to Part 51.917(f).