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March 31, 2014

**By Hand Delivery**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Attention: Wireline Competition Bureau

**Re: Supplement to Petition for Limited Waiver of 47 C.F.R. § 51.917(b)  
Lumos Telephone Inc. and Lumos Telephone of Botetourt Inc.  
Connect America Fund, WC Docket Nos. 10-90 et al.**

Dear Ms. Dortch:

On behalf of Lumos Telephone Inc. and Lumos Telephone of Botetourt Inc. (“the Companies”), JSI respectfully submits the above-referenced Supplement to Petition for Limited Waiver (“Supplement”). At the request of Commission staff, this Supplement provides supporting information for the Companies’ petition for limited waiver of Federal Communications Commission rules Section 51.917(b)(7)(ii), 2011 Rate of Return Carrier Base Period Revenue.<sup>1</sup>

The Lumos Companies seek confidential treatment under the Third Protective Order in this proceeding.<sup>2</sup> Pursuant to the Order, one copy of the confidential document and two copies of the redacted version are provided. The redacted version is also being filed on the Electronic Comment Filing System.

Please direct inquiries regarding the Companies’ Supplement to the undersigned consultant for the Company.

Sincerely,

John Kuykendall  
JSI Vice President  
301-459-7590  
[jkuykendall@jsitel.com](mailto:jkuykendall@jsitel.com)

Enclosures

cc: Chief, Wireline Competition Bureau

<sup>1</sup> Petition of Lumos Telephone Inc. and Lumos Telephone of Botetourt Inc. for Limited Waiver of 47 C.F.R. § 51.917(b), WC Docket Nos. 10-90 et al. (Nov. 6, 2013).

<sup>2</sup> See Third Protective Order, WC Docket Nos. 10-90 et al., DA 12-1418 rel. Aug. 30, 2012 (“Order”).

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### SUPPLEMENT TO PETITION OF LUMOS TELEPHONE INC. AND LUMOS TELEPHONE OF BOTETOURT INC. FOR LIMITED WAIVER OF 47 C.F.R. § 51.917(b)

At the request of FCC Wireline Competition Bureau staff, Lumos Telephone Inc. (“Lumos”) and Lumos Telephone of Botetourt Inc. (“R&B”) (collectively, the “Companies”) hereby provide support in a Tariff Review Plan (“TRP”) format for the Companies for both 2012 and 2013 filings which pertain to the fiscal years 2011 and 2012, respectively. The attached Excel spreadsheets provide the information in the TRP format as well as mapping of the non-LTR to LTR.

#### **Process to Develop Tariff Review Plans**

The original TRP and the originating traffic calculations for the Waiver were based on detailed calculations of the type of carrier and type of traffic flowing through the Companies’ networks. The data stems from CABs billing reports which were manually developed. Although the detailed data used for the calculations of FY 2011 were readily available, the detail for FY 2012 was not. Unfortunately, the labor intensive nature of pulling the 2012 report delayed the completion of the spreadsheet. In addition, in January, Lumos underwent a USAC audit to provide some of the same information.

#### **Traffic on Direct Trunks**

The Companies have a quite complicated network. It consists of 2 host offices, 2 remote offices and a tandem. The tandem provides tandem functions for Lumos, R&B, Highland Telephone, wireless carriers, and several competitive local exchange carriers (“CLECs”). The interexchange carriers (“IXCs”), Highland, R&B, wireless carriers and CLECs all have direct trunks to the tandem. In addition, a few IXCs have direct trunks to the Covington central office and the Waynesboro central office. To identify the traffic that is routed on which direct trunks, the Companies had to determine the traffic from each subset of carriers that have direct trunks to each of the locations.

#### **Tariff Review Plans**

The spreadsheet has three tabs: the filed TRP, the TRP corrected with originating traffic and the backup detail.

The filed TRP tab shows the original units and rates for the terminating traffic as submitted.

The corrected TRP includes the originating units and rates that were added as separate line items. The 2012 proposed rates were updated to show revised rates to achieve 50% of the difference between state and federal rates for the 2011 demand.

The detail tab, shows the actual minutes, mileage and rates used to calculate the intrastate access under non-LTR and under LTR. Originating and terminating calculations are shown separately. The terminating calculation includes both the transport and end office rate elements. The originating calculation only includes the traffic that is routed on direct trunks and does not include end office elements or transport that is not carried on direct trunks. To more accurately show the calculations, the transport minutes are broken down by different categories: ILEC traffic, wireless and CLEC traffic, R&B and Highland traffic, and Covington traffic.

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The detail tab also includes the following calculations:

- FY 2011 demand at 2011 state rates
- FY 2011 demand at 2011 interstate rates
- FY 2011 demand at actual implemented 2012 rates
- FY 2011 demand at updated 2012 rates that take into consideration the originating traffic on direct trunks
- FY 2012 actual demand and revenue by rate element

### **Rate Structure**

The FCC rules allowed companies to either remain on their current rate structure or move to the federal rate structure for 2012. The choice was dictated by Virginia state law. In 2012, Virginia law prevented introduction of any new rate elements, so the Companies could not introduce Tandem Transport Termination, Tandem Transport Facility or direct trunks into their state tariff. The state law has since been changed to allow LTR to be implemented. Accordingly, the 2012 revenue is calculated using a non-LTR rate structure.

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**ATTACHMENT**

**Tariff Review Plan Spreadsheets**

**ATTACHMENT REDACTED IN ITS ENTIRETY**