



October 4, 2021

Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Dear Ladies and Gentlemen:

This cover letter services as required notice indicating some or all of the information designated in the Missouri Public Service Commission Annual Report for Telecommunications Companies and IVoIP Providers is designated as confidential. Request is made for non-public treatment under seal.

The names, phone numbers and e-mail addresses of the persons responsible for answering questions regarding the confidential information is as follows:

Ed Endicott
Manager Tax
(720) 615-2141
ntta.tax@global.ntt

Larry Tezak
Vice President Tax
(720) 615-2137
ntta.tax@global.ntt

The following information is to be kept under seal:

All information identified as confidential on the Confidential Annual Report filed with the Commission


The reasons the specific information should be closed record:

- 1) NTT America, Inc. is a privately held company and does not release financial information.
- 2) NTT America, Inc. provides only IVoIP service and reports those line counts separately. The company is required by the Commission to submit those customer line counts as confidential.

We attest that none of the information is available to the public in any format. Attached to the annual report is verification that we have 1) examined the foregoing report; that to the best of our knowledge, information, and belief, all statements of fact contained in the said report are true and the said report is a correct statement of the business and affairs of NTT America, Inc., and 2) examined (and updated as applicable) the Company's contact information in EFIS; to the best of our knowledge, information, and belief, all listed contacts are correct. This electronically signed verification filed with the Confidential Annual Report shall act as required affidavit.

If you have any questions, feel free to give me a call during the hours of 7am and 3pm Mountain Time at (720) 615-2141 or contact us by email at ntta.tax@global.ntt

Thank You

DocuSigned by:

A8FA4A4A2D99496...

Ed Endicott
Manager Tax

NTT America, Inc.

Company Name

(Provide the full name of the company as certificated or registered with the Missouri Public Service Commission, including any Commission approved d/b/a, if applicable. Please do not abbreviate.)

**TELECOMMUNICATIONS COMPANY OR IVoIP PROVIDER
ANNUAL REPORT
TO THE
MISSOURI PUBLIC SERVICE COMMISSION**

**For the Calendar Year of
January 1 - December 31, 2020**

This filing is required pursuant to Commission Rule 20 CSR 4240-28.012 and/or Section 392.210 RSMO.

Please select how the company is certificated and/or registered with the Commission (check all that apply):

- Incumbent Local Telecommunications Company (ILEC)
- Competitive Local Exchange Telecommunications Company (CLEC)
- Interexchange or Local Non-Switched Telecommunications Company (IXC)
- Interconnected Voice over Internet Protocol Service Provider (IVoIP)

If more than one certificate or registration is held by the company you must file an annual report in the Commission's Electronic Filing and Information System (EFIS) for each certificate or registration. In such situations, we anticipate the annual reports to be identical; however please verify the following:

- The various annual reports filed in EFIS are **identical**.
- The various annual reports filed in EFIS are **different**.
- Not applicable *(Company only has one certificate or registration; therefore only one annual report was filed in EFIS.)*

Please choose one of the following filing options to indicate the security level of the filing:

- Public submission** (NOT Confidential)
- Non-Public submission** (Confidential) (See instructions for special requirements.)
For this filing to be considered Confidential, additional submission of materials is required, pursuant to Commission Rule 20 CSR 4240-2.135.

Public
For use when filing under seal.

Annual Report of NTT America, Inc.
 for the calendar year of January 1 - December 31, 2020

1. State in full the company's information below:

NTT America Inc

(720) 362-8200

Company Street Address

Telephone Number

8300 E Maplewood Ave., Ste 400

Company Mailing Address (if different from street address)

Greenwood Village CO 80111

City

State

Zip

2. The company's contact information in EFIS has been reviewed (and updated as applicable).

Yes

No

3. Annual Report Contact Information:

List the contact information of the person completing the form, whether an employee or a third-party preparer. This may differ from the address in Item No. 1.

Ed Endicott

Name

8300 E Maplewood Ave., Ste 400

Street Address

Mailing Address

Greenwood Village CO 80111

City

State

Zip

(720) 615-2141

Telephone Number

ntta.tax@global.ntt

Email Address

4. Identify the company's top three principal or general officers at the end of the year.

Title	Name
President & CEO	Simon Walsh
Treasurer	Sally Rawlinson
Secretary	Jordan Kanfer

Annual Report of

NTT America, Inc.

for the calendar year of January 1 - December 31, 2020

5. Please provide the following revenue information:

Row	RETAIL END USER REVENUES	**	MO Intrastate (Column A)	**	**	Total Company (Column B)	**
1.	Local Service (Basic local telecommunications service, IVoIP service and features associated with these services)	**		**	**		**
2.	Interexchange Service (Message toll services, 800 services, interexchange operator services).	**		**	**		**
3.	Non-Switched Services (Dedicated non-switched private line services typically used by business customers. <i>Do not include special access or private line services provided to other telecommunications or IVoIP service providers which are reported in Row 7).</i>	**		**	**		**
4.	Bundled Voice Service (If telecommunications or IVoIP service is bundled with non-regulated services then a company may apply either of two methods in reporting bundled revenue in Column A. Method 1: Report bundled revenue in Column A based on the unbundled rate for telecommunications or IVoIP service; or Method 2: Report all bundled revenue in Column A.)	**		**	**		**
5.	Retail Uncollectibles. (Amount is typically a negative number.)	**		**	**		**
6.	RETAIL END-USER TOTAL (Row 1+2+3+4+5) Revenue in Column A will be provided to Missouri USF Administrator for assessment purposes.)	**		**	**		**
WHOLESALE CARRIER'S CARRIER AND UNIVERSAL SERVICE FUND REVENUES							
7.	Revenue from services provided for resale as telecommunications or IVoIP services from another telecommunications or IVoIP service provider. This row typically includes revenue associated with switched access service, special access service, billing and collection service. NECA settlements, if any, should be reported solely in Column B.	**		**	**		**
8.	Miscellaneous Carrier's Carrier Revenue (Remaining Carrier's Carrier Revenue provided in FCC Form 499-A, Block 3 that is not reported in Row 7).	**		**	**		**
9.	Wholesale Uncollectibles. (Amount is typically a negative number.)	**		**	**		**
10.	Federal USF Revenue (List federal USF revenue in Column B; however, any Connect America Fund Inter-carrier Compensation funding used to replace revenue caused by mandatory intrastate switched access rate reductions should be reported in Column A.)	**		**	**		**
11.	State USF Revenue	**		**	**		**
12.	TOTAL REVENUES (Row 6+7+8+9+10+11) The Total Revenue in Column A should match the Total Gross Intrastate Operating Revenue reported on the Missouri PSC's Statement of Revenue form.	**		**	**		**

Revenue reporting clarifications:

Total Company Revenue (Column B) = Missouri Intrastate revenue in Column A + Interstate revenues + International revenues.

IVoIP revenue: If unable to distinguish Missouri Jurisdictional revenue in Column A then a safe harbor percentage can be applied to total revenue that corresponds to the FCC's safe harbor percentage.

Retail non-switched private line service revenue: All of a customer's non-switched private line service revenue can be reported in Column B if 10% or more of the customer's private line network traffic is considered interstate traffic.

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Annual Report of

NTT America, Inc.

for the calendar year of January 1 - December 31, 2020

Relay Missouri Assessment¹**Annual Totals**

7. Revenue Collected From Relay Missouri Surcharge	**		**
Amount Retained for Billing and Collecting the Surcharge	**		**
Relay Missouri Revenue Remitted to Relay Missouri Fund	**		**

8. Please indicate the per line value of the Relay Missouri Surcharge applied to your customers in December.

9. If your firm did not impose the Relay Missouri Surcharge, please explain:

An error has been identified in The Company's billing system configuration that failed to assess the Surcharge based on access line count for intrastate session initiation protocol (SIP) network transactions. This error is being rectified during the current calendar year.

¹ ILECs, CLECs and IVoIP providers are required to complete this page; however, companies classified solely as IXCs are not expected to complete this page.

For use when filing under seal.

For the calendar year January 1 - December 31, 2020

Company Name: NTT America, Inc.

VERIFICATION

The foregoing report must be verified by the Oath of the President, Treasurer, General Manager or Receiver of the Company.

OATH

State Of Colorado }
County Of Arapahoe } ss:

Larry Tezak makes oath and says that
Name of Affiant (Company Official/Representative)

s/he is Vice President Tax
Official Title of the Affiant (Company Official/Representative)

of NTT America, Inc.
Exact Legal Title or Name of the Respondent (Certificated Company Name)

and is located at 8300 E Maplewood Ave., Ste 400, Greenwood Village, CO 80111 (720) 362-8200
Address and Telephone Number of the Affiant (Company Official/Representative)

that s/he has 1) examined the foregoing report; that to the best of his or her knowledge, information, and belief, all statements of fact contained in the said report are true and the said report is a correct statement of the business and affairs of the above-named respondent, and 2) examined (and updated as applicable) the Company's contact information in EFIS; to the best of his or her knowledge, information, and belief, all listed contacts are correct.

from January 1, 2020, to and including December 31, 2020
Month/Day Year Month/Day Year

DocuSigned by:
ISI Larry Tezak
Signature of Affiant (Company Official/Representative)
68904031388F4E5...
(If electronic signatures are used, you **must** use "s/" before the name.)

Under penalty of perjury, I declare that the foregoing is true and correct to the best of my knowledge and belief.

DocuSigned by:
ISI [Signature]
Signature of Declarant
A8FA4A4A2D99496...
(If electronic signatures are used, you must use "s/" before the name.)