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**VIA E-FILE**

June 13, 2024

Morris L. Woodruff  
Secretary  
Missouri Public Service Commission  
200 Madison Street, PO Box 360  
Jefferson City, MO 65102

RE: WC Docket No. 10-90: Administration of Connect America Fund Intercarrier Compensation Replacement §54.304(d)(1), Transition of Carrier Access Charges §51.909, and Eligible Revenue Recovery § 57.917(d)(vii)

Moss Adams LLP respectfully files on behalf of Citizens Telephone Company with the Missouri Public Service Commission this Request for Confidential Treatment of Information (the "Request"). The Request seeks confidential treatment of certain financial and subscriber information contained in its filings that include the projected eligibility for CAF ICC funding for July 1, 2024 through June 30, 2025, and Tariff Review Plan (TRP) data governing the local switched access rates. This request is made pursuant to 20 CSR 4240-2.135(2)(A)3.

Pursuant to 47 C.F.R. §54.304(d)(1) of the Federal Communications Commission's rules, enclosed please find the projected eligibility for CAF ICC funding for July 1, 2024 through June 30, 2025 for Citizens Telephone Company, Study Area Code 421865. This projection includes any true-ups associated with earlier filing periods. This projection has also been filed as confidential with the Federal Communications Commission and the Universal Service Administrative Company, as the administrator of the Federal Universal Service Fund.

As previously filed in accordance with 47 C.F.R. §51.909 governing Carrier Access Charges; Citizens Telephone Company provides supplemental TRP data. Lastly, copies of annual certifications regarding CAF ICC Data reported to the Federal Communications Commission specifically required for Double Recovery as specified in 47 C.F.R. §57.917 (d)(vii) are included with this filing.

Enclosed is a redacted version of this filing, as well as the confidential version stamped accordingly.



MOSSADAMS

Should you have any questions regarding this filing, please contact me.

Sincerely,

**Tym Rutkowski**

Senior Manager

(509) 777-0137

[tym.rutkowski@mossadams.com](mailto:tym.rutkowski@mossadams.com)

Enclosures

cc: Ashley Greenwood (via email)  
Dennis Doyle (via email)  
Gina Hart (via email)

**Annual ETC Informational Filing of Citizens Telephone Company**

**COVER SHEET – CONFIDENTIAL DESIGNATION**

This Filing is designated as CONFIDENTIAL and filed under seal because it contains “market specific information relating to services offered in competition with others” pursuant to 20 CSR 4240-2.135(2)(A)3.

  
David Adams, EVP/GM



6/17/2024

**Filing Date:** Citizens Telephone Company of Highville, Missouri  
**Holding Company:** Citizens Telephone Company of Highville, Missouri  
**Filing Name:**

Enter in cell D6 of this worksheet the amount that is in cell BE6, worksheet 2024 Eligible Recovery Summary, workbook 2024 ROR IEC ICC data.  
 Enter in cell D7 of this worksheet the amount that is in cell J10, worksheet CAF Calc, workbook 2024 RateCeiling CAF ROR IEC.  
 Enter in cell D9 of this worksheet the amount that is in cell M10, worksheet CAF Calc, workbook 2024 RateCeiling CAF ROR IEC.  
 Enter in cell D10 of this worksheet the amount that is in cell L10, worksheet CAF Calc, workbook 2024 RateCeiling CAF ROR IEC.

Eligible Revenue - Current Yr Recovery  
 ARC Revenue Assessed Per \$1.917(e) And Imputed Per \$1.917(f)(2)  
 Tariffed ARC Revenue  
 CAF ICC Support After ARC Imputation For CBOL Lines  
 Imputed ARC Revenue From Projected CBOL Lines Per \$1.917(f)(4)

Residential Rate Ceiling \$ 30.00  
 Maximum MLB SIC\*ARC \$ 12.20  
 Max ARC for current year: Res/SLB \$ 3.00  
 Max ARC for current year: MLB \$ 6.00  
 Max ARC increase per year: Res/SLB \$ 0.50  
 Max ARC increase per year: MLB \$ 1.00

Eligible Revenue - Current Yr Recovery  
 Tariffed ARC Rev + CAF ICC Support + Imputed ARC Rev From CBOL Lines

State	Exchange/ZIP	Res / NP Tariff Period Projected Lines	SLB / BRI Tariff Period Projected Lines	Maximum Total Rate Applies w/o ARC	RES / NP Current Year		RESIDENCE / NP / BRI / SIE (excluding Lifetime)		SLB / BRI Previous Yr Arc Rate	SLB / BRI Current Year Maximum Arc Rate	Total RES / NP Rate	Total RES / NP below Res Rate Ceiling (LSB)	ARC Revenue at Tariffed Rate	NonCentrex Tariff Period Projected Lines	Centrex Tariff Period Projected Lines	MLB Federal SIC	NonCentrex Previous Yr Arc Rate	NonCentrex Crit Yr Max ARC Rate
					RES / NP Maximum Arc Rate	Tariffed ARC Rate	RES / NP Previous Yr Arc Rate	Tariffed ARC Rate										
MO	MO - Highville				31.10	3.00	3.00	3.00	3.00	3.00	31.10	NO				9.20	3.00	3.00
State Totals																		













Filing Date: 6/17/2024  
 Filing Entity: Citizens Telephone Company of Highville, Missouri  
 Transmittal Number: 45  
 COSA: 421865

Intrastate Eligible Recovery Summary

	TY 2022-2023	TY 2023-2024	TY 2024-2025
Total FY 2011 Actual Revenue for Transitional Intrastate Access Service Rate Elements	0.5583	0.5404	0.5133
Base Line Adjustment Factor X Total FY 2011 Actual Revenue for Transitional Intrastate Access Service Rate Elements	0.95*F10	0.95*H10	0.95*I10
BAF X Total FY 2011 Actual Revenue for Transitional Intrastate Access Service Rate Elements	G54	J54	NS4
Total Expected Maximum Transitional Intrastate Access Service Revenue	F11-F12+I13	H11-H12+H13	J11-J12+J13
Intrastate True-Up Adjustment			
Total Intrastate Eligible Recovery			

Intrastate Tariff Section	USOC	Intrastate Switched Access Rate Elements for Transitional Intrastate Access Service Categories	Unit of Demand (e.g., MOU or DS1)	Intrastate Rate and Eligible Recovery Calculations											
				TY 2022-2023	TY 2022-2023	TY 2022-2023	TY 2022-2023	TY 2022-2023	TY 2022-2023	TY 2022-2023	TY 2022-2023	TY 2022-2023	TY 2022-2023		
Input	Input	Input (Note 2)	Input	7/1/2022 Intrastate Rate (Note 3)	TY 2022-2023 Expected Intrastate Revenue	7/1/2023 Intrastate Rate	TY 2023-2024 Expected Intrastate Revenue	7/1/2024 Proposed Intrastate Rate	TY 2024-2025 Time-Up Intrastate Revenue	TY 2022-2023 Maximum Intrastate Revenue	TY 2022-2023 Expected Intrastate Units Less Actual Realized Intrastate Units	TY 2022-2023 Actual Realized Intrastate Units	Input (Notes 5, 6)	TY 2024-2025 Expected Maximum Intrastate Revenue	TY 2024-2025 Expected Maximum Intrastate Revenue
** TERMINATING TANDEM SWITCHED TRANSPORT ACCESS SERVICE **		Terminating Tandem Switched Common Transport	MOU/Min/BIP	0.000102	0.000102	E	0.000102	0.000102	E*	F-K	F-K	Input (Note 4)	F-K	H*	H
Tandem Switched Facility		Terminating Tandem Switched Common Transport	MOU/Terms	0.000102	0.000102		0.000102	0.000102							
Terminating Tandem Switching		Terminating Tandem Switching	MOU	0.002671	0.002671		0.002671	0.002671							
** ORIGINATING AND TERMINATING DEDICATED TRANSPORT ACCESS SERVICE **		Originating and Terminating Entrance Facilities													
Originating and Terminating Tandem Switched Dedicated Transport		Originating and Terminating Tandem Switched Dedicated Transport													
Originating and Terminating Direct-Trunked Transport		Originating and Terminating Direct-Trunked Transport													
<b>Total</b>															

Rate Element Note: Tariffed rate elements with no expected demand in the forecasted tariff year have been omitted from the TRP. Any realized revenue with omitted rates will be included in the true up calculation.

Filing Date:	6/17/2024
Filing Entity:	Citizens Telephone Company of Higginsville, Missouri
Transmittal Number:	45
CSAK:	421865

Net Reciprocal Compensation Eligible Recovery Summary			
	TY 2022-2023	TY 2023-2024	TY 2024-2025
Reciprocal Compensation Eligible Recovery Revenue	C21 C27 C9-C10	D21 D27 E9-E10	E21 E27 G9-G10
Reciprocal Compensation Eligible Recovery Expense			
Net Reciprocal Compensation Eligible Recovery			

Reciprocal Compensation Eligible Recovery Revenue Calculations				
Revenue Category	FY 2011 Revenue	TY 2022-2023 Rec. Comp. Eligible Recovery Revenue	TY 2023-2024 Rec. Comp. Eligible Recovery Revenue	TY 2024-2025 Rec. Comp. Eligible Recovery Revenue
End Office Switching	Input	.95*11*B	.95*12*B	.95*13*B
Resident Switching				
Common Transport				
Transport & Termination				
Total				

FY 2011 Reciprocal Compensation Expense				
Expense Category	FY 2011 Expense	TY 2022-2023 Rec. Comp. Eligible Recovery Expense	TY 2023-2024 Rec. Comp. Eligible Recovery Expense	TY 2024-2025 Rec. Comp. Eligible Recovery Expense
Total Expense	Input	.95*11*B	.95*12*B	.95*13*B

Filing Entity	COSA	Study Area Name	TY 2022-2023 Total Eligible Recovery After True-Up Including Otherwise Unrecoverable True-Up Revenue	TY 2022-2023 Interstate Eligible Recovery (After True-Up)	TY 2022-2023 Intrastate Recovery (After True-Up)	TY 2022-2023 Net Recip. Comp. Eligible Recovery	TY 2022-2023 Total of Exogenous Cost Increments	ARC True-Up for TY 2020-2021
Citizens Telephone Company of Higginsville, Missouri	421865	Citizens Telephone Company of Higginsville, Missouri						

Imputed ARC Revenue From CBOL Lines True Up For TY 2020-2021	Total of Exogenous Cost True-Ups for TY 2020-2021

TY 2020-2021 Otherwise Unrecoverable True-Up Revenue	TY 2022-2023 Double Recovery Adjustment	TY 2022-2023 Expected Maximum ARC Revenue	TY 2022-2023 Expected ARC Revenues Assessed Per 51.917(e) And Imputed Per 51.917(f)(2)	TY 2022-2023 Expected Imputed ARC Revenue From Projected CBOL Lines Per 51.917(f)(4), After 51.917(f)(5) Limit	TY 2022-2023 Expected CAF ICC Support After ARC Imputation For CBOL Lines	TY 2022-2023 Projected Res Eligible ARC Lines	TY 2022-2023 Projected SLB Eligible ARC Lines	TY 2022-2023 Projected MLB Eligible ARC Lines	TY 2022-2023 Total Projected CBOL Line Demand	TY 2022-2023 Total Projected Revenue From CBOL Lines	TY 2023-2024 Total Eligible Recovery After True-Up Including Otherwise Unrecoverable True-Up Revenue	TY 2023-2024 Interstate Eligible Recovery (After True-Up)
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TY 2023-2024 Intrastate Eligible Recovery (After True-Up)	TY 2023-2024 Net Recip. Comp. Eligible Recovery	TY 2023-2024 Total of Exogenous Cost Increments	ARC True-Up for TY 2021-2022	Imputed ARC Revenue From CBOL Lines True Up For TY 2021- 2022	Total of Exogenous Cost True-Ups for TY 2021-2022	TY 2021-2022 Otherwise Unrecoverable True-Up Revenue	TY 2023-2024 Double Recovery Adjustment	TY 2023-2024 Expected Maximum ARC Revenue	TY 2023-2024 Expected ARC Revenues Assessed Per 51.917(e) And Imputed Per 51.917(f)(2)	TY 2023-2024 Expected Imputed ARC Revenue From Projected CBOL Lines Per 51.917(f)(4), After 51.917(f)(5) Limit	TY 2023-2024 Expected CAF ICC Support After ARC Imputation For CBOL Lines	TY 2023-2024 Projected Res Eligible ARC Lines
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TY 2024-2025 Expected ARC Revenues Assessed Per 51.917(e) And Imputed Per 51.917(f)(2)	TY 2024-2025 Expected Imputed ARC Revenue From Projected CBOL Lines Per 51.917(f)(4)	TY 2024-2025 Expected CAF ICC Support After ARC Imputation For CBOL Lines	TY 2024-2025 Projected Res Eligible ARC Lines	TY 2024-2025 Projected SLB Eligible ARC Lines	TY 2024-2025 Projected MLB Eligible ARC Lines	TY 2024-2025 Total Projected CBOL Line Demand	TY 2024-2025 Total Projected Revenue From CBOL Lines
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**TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING DATA ON THE CARRIER'S BEHALF:**

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

I certify that (Name of Agent) Moss Adams LLP is authorized to submit the 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 <u>Moss Adams LLP</u>			
Name of Reporting Carrier <u>Citizens Telephone Company</u>			
Signature of Authorized Officer <u>David Adams</u>			Date <u>06/03/2024</u>
Printed name of Authorized Officer <u>David Adams</u>			
Title or position of Authorized Officer <u>EVP/GM</u>			
Telephone number of Authorized Officer: <u>(660) 644-5411</u> , ext. _____			
Study Area Code of Reporting Carrier	<u>421865</u>	Filing Due Date for this form (mm/dd/yyyy)	<u>06/17/2024</u>

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.

**TO BE COMPLETED BY THE REPORTING CARRIER,**

**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: Citizens Telephone Company			
Signature of Authorized Officer: <i>David Adams</i>		Date: 06/03/2024	
Printed name of Authorized Officer: David Adams			
Title or position of Authorized Officer: EVP/GM			
Telephone number of Authorized Officer: (660) 644-5411 ext.			
Study Area Code of Reporting Carrier	421865	Filing Due Date for this form (mm/dd/yyyy)	06/17/2024

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**TO BE COMPLETED BY AN OFFICER OF THE REPORTING CARRIER**

**Certification of Officer for Rate-of-Return Carrier Not Seeking Duplicative Recovery**

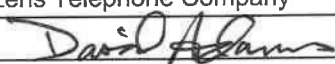
I certify that I am an officer of the reporting carrier and that, to the best of my knowledge, this reporting carrier is not seeking duplicative recovery in the state jurisdiction for any Eligible Recovery subject to the recovery mechanism as per 51.917(d)(vii).

Name of Reporting Carrier				Citizens Telephone Company	
Signature of authorized officer				Date	06/03/2024
Printed name of authorized officer		David Adams			
Title or position of authorized officer		EVP/GM			
Telephone number of authorized officer:		(660) 644-5411 ext.			
Study Area Code of Reporting Carrier	421865	Filing Due Date for this form (mm/dd/yyyy)	06/17/2024		
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.					

**TO BE COMPLETED BY AN OFFICER OF THE REPORTING CARRIER**

**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				Citizens Telephone Company	
Signature of authorized officer				Date	06/03/2024
Printed name of authorized officer		David Adams			
Title or position of authorized officer		EVP/GM			
Telephone number of authorized officer:		(660) 644-5411, ext.			
Study Area Code of Reporting Carrier	421865	Filing Due Date for this form (mm/dd/yyyy)	06/17/2024		

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.