

April 14, 2025

**VIA EFIS**

Missouri Public Service Commission  
200 Madison Street  
Jefferson City, MO 65102

Re: Request for Confidential Treatment for CY 2024 Telecommunications/iVoIP  
Annual Report

To Whom It May Concern:

RCLEC, Inc. respectfully requests confidential treatment for the submission of its CY 2024 Telecommunications/iVoIP Provider Annual Report due to the commercially sensitive and proprietary nature of the information contained herein.

Should you require any additional information regarding this submission, please contact me at [regulatory@ringcentral.com](mailto:regulatory@ringcentral.com) or (202) 379-4511.

Respectfully submitted,



Spencer Kelly  
*Legal Analyst*

RCLEC, 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/IVoIP ANNUAL REPORT  
TO THE  
MISSOURI PUBLIC SERVICE COMMISSION**

**For the Calendar Year of  
January 1 - December 31, 2024**

This filing is required pursuant to Commission Rule 20 CSR 4240-28.012 and 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 unsure of the company's authorization, see list of companies at: [https://psc.mo.gov/Forms/Telecommunications\\_Forms](https://psc.mo.gov/Forms/Telecommunications_Forms)

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

- ☒ **Public**
- ☐ **Confidential** (See instructions for how to file an annual report under seal)

Excel Issue Date: 02-04-25

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For use when filing under seal.

**Annual Report of RCLEC, Inc.**

**for the calendar year of January 1 - December 31, 2024**

**1. Provide the following company information:**

20 Davis Drive	(650) 263-1123
Company Street	Telephone Number
	<a href="http://www.rclec.com">www.rclec.com</a>
Company Mailing Address (if different from street address)	Company Website Address (if no website insert "none")
Belmont, CA 94002	
City State Zip	

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

☒ Yes ☐ No

**3. Provide the following information for the person completing this annual report:**

Name: Spencer Kelly	Street Address:
Email Address: <a href="mailto:regulatory@ringcentral.com">regulatory@ringcentral.com</a>	1919 M Street NW, 8th Floor
Telephone: (202) 379-4511	Washington, DC 20036

I am (check as appropriate): ☐ An employee of the company ☒ A third-party preparer

I am listed in EFIS as the company's annual report contact: ☒ Yes ☐ No

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

Title	Name
President	John Marlow
Secretary	Rachel Petty
Treasurer	Tarun Arora

**5. ILECs, CLECs and IVoIP companies are required to provide the following Relay Missouri assessment information:**

Relay Missouri: 2024 calendar year <sup>1</sup>			
Relay Missouri Surcharge applied per line in December 2024	**		**
Revenue Collected From Relay Missouri Surcharge	**		**
Amount Retained for Billing and Collecting the Surcharge	**		**
Relay Missouri Revenue Remitted to Relay Missouri Fund	**		**

**6. All companies are required to provide the following Missouri USF assessment information:**

Amount remitted to the Missouri USF fund for 2024 calendar year <sup>2</sup>	**		**
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*The amounts for Item Nos. 5 and 6 should reflect the time period associated with the payment and not dependent on when a payment is made. For example this amount can include a payment made in 2025 for a time period within 2024.*

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<sup>1</sup> For information about the Relay Missouri assessment see [https://psc.mo.gov/Telecommunications/Assessments\\_and\\_Filing\\_Requirements](https://psc.mo.gov/Telecommunications/Assessments_and_Filing_Requirements)

<sup>2</sup> For information about the Missouri USF assessment see [www.missouriurf.com](http://www.missouriurf.com).

for the calendar year of January 1 - December 31, **2024****7. Please provide the following revenue information:**

If no revenue was collected for any box insert \$0.

Row	RETAIL END USER REVENUES	Missouri Intrastate (Column A)	Missouri Interstate & International (Column B)	Missouri Total Company <sup>3</sup> (Column C)
1.	<b>Voice Local Service</b> (Basic local telecommunications service, IVolP service <sup>4</sup> including revenue with other features associated with these services. Includes any bundled service whereby these services are bundled with other non-regulated services. <sup>5</sup> )			
2.	<b>Interexchange Service</b> (Message toll services, 800 services, interexchange operator services).			
3.	<b>Non-Switched Services</b> <sup>6</sup> (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 IVolP service providers which are reported in Row 6.</i> )			
4.	<b>Retail Uncollectibles.</b> (Amount is typically a negative number.)			
5.	<b>RETAIL END-USER TOTAL</b> (Row 1+2+3+4) Revenue in Column A will be provided to Missouri USF Administrator for assessment purposes.)			
<b>WHOLESALE AND UNIVERSAL SERVICE FUND REVENUES</b>				
6.	<b>Wholesale Revenue</b> <sup>7</sup>			
7.	<b>Wholesale Uncollectibles.</b> (Amount is typically a negative number.)			
8.	<b>Federal USF Revenue</b> (This revenue will be usually listed in Column B; however, list in column A any Connect America Fund Intercarrier Compensation funding used to replace revenue caused by mandatory intrastate switched access rate reductions.)			
9.	<b>State USF Revenue</b>			
10.	<b>TOTAL REVENUES</b> (Row 5+6+7+8+9) The Total Revenue in Column A should match the Total Gross Intrastate Operating Revenue reported on the Missouri PSC's Statement of Revenue form.			

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<sup>3</sup> Total Company Revenue (Column C) = Column A revenue + Column B revenue.<sup>4</sup> IVolP 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 of 35.1% intrastate and 64.9% interstate or as otherwise adjusted by the FCC.<sup>5</sup> Bundled Service Revenue: If telecommunications or IVolP 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 IVolP service; or Method 2: Report all bundled revenue in Column A.<sup>6</sup> Retail Non-Switched Private Line Service Revenue: If 10% of more of the customer's private line network traffic is considered interstate traffic then 100% of the customer's non-switched private line service revenue can be classified as interstate traffic.<sup>7</sup> Wholesale Revenue: Revenue from telecommunications or IVolP services sold to other service providers including revenue associated with switched access service, special access service, billing and collection and any remaining carrier's carrier revenue provided in FCC Form 499-A, Block 3. NECA settlements should be reported in Column B.

for the calendar year of January 1 - December 31, **2024**

### 8. Line Quantities for Basic Local Telecommunications &/or IVoIP Services

[illegible]

\* Line quantities can be provided for a date other than December 31, 2024 if the date is within the month of December.

**Clarifications about reporting line quantities:**

1. Report line quantities for basic local telecommunications service and/or IVoIP service as those terms are defined in Section 386.020(4) and (23), RSMo.
2. Lines include analog and digital. For DS-1 or higher band-width facilities a voice grade equivalency must be used. For channelized service report the number of channels subscribed to by the customer. For non-channelized facilities, filers are instructed to use a good-faith estimate of the number of voice grade equivalent lines used for voice service.
3. Exchange refers to areas as listed in ILEC tariffs.
4. IVoIP line quantities must be filed on a confidential basis per Section 392.550(7)(c) RSMo. See instructions for how to file on a confidential basis.

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## VERIFICATION

Note: Prefer Affiant to be President, Treasurer, General Manager or Receiver of Company \*

Company Name: RCLEC, Inc.

Annual Report for calendar year **2024**

Affiant Information	
Name	Rachel Petty
Title	Secretary
City, State	Oak Park, IL
County	Cook

Under penalty of perjury, I declare the information contained in this annual report is true and correct to the best of my knowledge and belief.

\* If Affiant is not the President, Treasurer, General Manager or Receiver of the company then explain Affiant's ability to verify the accuracy of the information presented:

As the Secretary of RCLEC, Inc., Rachel Petty has the authority to verify the information presented in this Annual Report.

4/8/2025

Date

/s/ Rachel W. Petty

Signature of Affiant

*(If electronic signatures are used, you must use "/s/" before the name.)*

Subscribed and sworn to before me, a Notary Public, in and for the State and County above named,

this 8 day of April, 2025

My Commission expires 7/16/2027

/s/ Jason Franklin

Signature of Notary Public

*(If electronic signatures are used, you must use "/s/" before the name.)*

898128

Notary Commission Number

**Missouri Revised Statutes §392.210, §393.140 and §509.030**