



**Rose Mulvany-Henry**

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April 17, 2018

Morris L. Woodruff, Secretary  
Missouri Public Service Commission  
200 Madison Street, PO Box 360  
Jefferson City, MO 65102-0360

Re: TeleQuality Communications, LLC  
Amended Tariff Filing

Dear Secretary Woodruff:

TeleQuality Communications, LLC submits the attached: (i) original PSC Mo. No. 3 Tariff and, (ii) a **HIGHLY CONFIDENTIAL** cost itemization to support the tariffed rates as shown in Section 5.1.

TeleQuality offers telecommunications services to health care providers, predominately in rural areas. These services are supported, in part, through funds from the federal Rural Health Care ("RHC") program which is administered by the Federal Communications Commission and the Universal Service Administrative Company. Federal rules require TeleQuality, in certain circumstances, to file with state regulatory commissions tariffed rates and supporting cost data for all RHC supported services provided within that state. See, 47 C.F.R. 54.607(b)(1).

The new tariff, intended to replace the company's PSC Mo. No. 2 Tariff in its entirety, reflects that the company's name has changed from TeleQuality Communications, Inc. to TeleQuality Communications, LLC. The new tariff also substitutes specific rates for the maximum and minimum rates described in the old tariffs. A **HIGHLY CONFIDENTIAL**, itemized cost study demonstrates that each rate is cost-based. The elimination of a range of rates and the submission of itemized cost data to support the tariffed rate are both the result of recent discussions between TeleQuality and federal regulators who administer the RHC program.

We respectfully submit that these rates are justified not only by the itemized costs but by geographic conditions in Missouri. Our customers are typically located in very rural areas with unique geographic challenges. We also note that there are risks inherent in delivering services to rural customers under the RHC program – namely, that TeleQuality is assuming the risks of (1) higher credit risk of rural health care clinics, and (2) significant risk of delivery costs exceeding estimates due to the otherwise unserved or underserved nature of many of the sites affecting the availability of existing infrastructure that TeleQuality may contract with to provision the service.

Please acknowledge receipt of this by date-stamping the extra copy and returning it in the envelope that is provided for this purpose. Please call me if you have any questions. Thank you again for your assistance.

Very truly yours,

A handwritten signature in black ink, appearing to read "Rose Mulvany Henry". The signature is fluid and cursive, with the first name "Rose" being the most prominent.

Rose Mulvany Henry  
Bradley Arant Boult Cummings LLP  
For TeleQuality Communications

Attachments