

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of an Investigation in which to)	
Gather Information about the Facility)	
Extension Practices of ETCs Eligible to)	File No. TO-2016-0184
Receive High Cost USF Support)	

RESPONSES OF ELLINGTON TELEPHONE COMPANY

1. Provide a direct link to the specific portion of a company's website or alternatively cite the specific portion of a company's tariff that describes the charges, allowances and other relevant information for line extensions or situations where facilities are not in place to fulfill an applicant's request for service.

PSC MO No. 3, General Rules and Regulations, Sheets 37-40

2. Does your company not apply any construction or similar one-time charges if the distance to extend facilities is within a certain distance? If yes, what is the maximum distance whereby the company will not apply any special charges to extend facilities?

Currently, a line construction distance allowance of approximately one mile per served applicant is provided by the Company at no extra charge, subject to individual case basis considerations. See attached Exhibit A – ICB Considerations.

Federal Universal Service Fund High Cost Support mechanisms have provided Ellington Telephone Company with funding for capital expenditures on plant expansion and plant improvement projects, as well as funding for operating expenses to maintain plant facilities. This additional, major revenue source, allows the Company to implement more liberal line extension practices than the rules expressed in its Tariffs. However, the FCC's currently pending (and future) USF reform actions may eliminate and/or significantly reduce certain High Cost Support funding. Reductions in, or loss of, federal support revenues may impact the Company's future facilities extension policies.

Ellington Telephone has exercised its option to require advance payments and/or construction charges on limited occasions. It has been more than 20 years since the Company has received line extension cost contributions from a subscriber.

3. Does your company provide the customer with a certain dollar allowance for construction costs to extend facilities? If yes, what is the allowance?

The allowance is distance based as opposed to a certain dollar allowance.

4. Are charges for extending facilities applied based on a set formula (i.e., \$100 per 1/10 mile) or alternatively are charges determined on an individual case basis?

Individual case basis.

a. If charges are based on a set formula then identify the formula.

Not applicable

b. If charges are based on an ICB basis then:

i. Explain what types of costs are identified to form the basis for these charges.

Historically, all completed construction costs for placement of Cable & Wire Facilities are included in charge calculations. No instances have occurred to date where costs of COE-Transmission Circuit Equipment Facilities were included in charge calculations.

ii. Approximately what percent of all costs for extending facilities is the customer expected to pay?

In addition to allowance costs absorbed by the Company, the excess facilities extension cost chargeable to the subscriber is determined on an individual case basis.

5. If a customer agrees to pay special construction charges and facilities are installed, does the company generally install sufficient facilities to serve other neighboring customers in the subdivision or nearby area? **Yes, however, the excess facilities extension costs assessed to the initial applicant(s) is based on the prorated incremental cost of facilities required to serve the initial applicant(s).** If yes, explain what happens, if anything, to the initial customer as well as any subsequent customers requesting service in that area. For example are subsequent customers assessed any special construction charges? **No.** Can the initial customer receive a credit or refund? **No.** Explain how the company handles such situations. **There have been no occurrences of such situations.**

6. If the company lacks facilities to provide service is the customer required to agree to any special terms or conditions for obtaining service (i.e., subscribe to service for a minimum length of time) that typically are not applied to other customers where sufficient facilities are in place? If yes, describe such any terms or conditions.

Yes, a three-year advance revenue deposit is stated as an optional condition in the Company's Tariff. However, it has been more than 20 years since the Company has applied this condition to a subscriber.

7. Does your company apply any termination charge(s) if a customer fails to subscribe to service for a certain length of time? If yes, identify the charge(s).

The Company may require an advance revenue deposit for a certain length of time. In the event the service is discontinued by the original depositor prior to the expiration of the advance payment term, no refund will be made. However, upon proper application, the Company will transfer the unexpired service term to a new subscriber at the same location.

8. How long have the existing policies in response to Questions 1 thru 7 been in place in Missouri?

More than 20 years.

9. If your company operates in other states besides Missouri does the company apply the same policies (as provided in responses to Questions 1 thru 7) in these other states for service requests in areas where the company lacks sufficient facilities to provide service? If yes, identify the states. If no, identify the states and explain how and why the company's policies differ.

Not applicable.

10. Describe or provide a script of what information is provided by the company to the customer if the company lacks facilities to respond to the customer's service request.

The Company does not have scripted information to be provided to the subscriber. On the few occasions that information has been provided to customers, the information was based on the specific circumstances involved.

11. Please provide the following information for your company's Missouri operations for the most recent 12 month time period:

- a. Total requests for service. **285**
- b. Service requests for an area where the company lacks sufficient facilities to provide service. Among these requests break this number down into the following categories:
 - i. Number of requests where the company installed facilities without applying special construction or similar charges. **26**
 - ii. Number of requests where the customer paid the construction charges. **None**
 - iii. Number of requests where the customer declined to pay the construction charges and service was not installed. **None**
 - iv. Other. Explain. **None**

12. Does the company consider an unfilled service request as reported in Form 489 to include a customer who requests service but ultimately declines to pay construction or similar charges? If no, explain why not.

No unfilled service requests have occurred since the inception of FCC Form 481 reporting. However, if the Company had proposed facilities extension charges to an applicant for service, and the applicant chose not to pay the charges; this would not be, in the Company's opinion, an unfilled service request.

13. Please provide the following information for any customer requesting service in the past 12 months whereby the company attempted to apply construction or similar charges in order to have service be extended to the customer:

- a. Name of applicant.
- b. Location of applicant.
- c. Total amount of construction charges.
- d. Indicate whether the customer paid the charges and service was installed.

Not applicable/No occurrences

14. If a company has detariffed is the link provided in response to Question No. 1 a link **to the company's rates and charges for all other retail services or is the link to some other separate document?**

Not applicable