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May 18, 2018

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

Re: File No.: XR-2018-0295

TeleQuality Communications, LLC
Amended Tariff Filing – Original PSC Mo. No. 4 Tariff

Dear Secretary Woodruff:

TeleQuality Communications, LLC (“TeleQuality”) submits the attached: (i) original PSC Mo. No. 4 Tariff and, (ii) a **CONFIDENTIAL** cost itemization to support the revised tariffed rates as shown in Section 5.1.

On April 18, 2018, TeleQuality submitted a tariff filing (original PSC Mo. No. 3 Tariff) to reflect a name change for the company (from “TeleQuality Communications, Inc.” to “TeleQuality Communications, LLC”), and to modify rates for the company’s private line service offerings. On April 25, 2018, the company filed a revised Sheet No. 30 to further modify its rates. On April 26, 2018, the TeleQuality filed a letter to provide additional information required by the Commission regarding the company’s requested name change. On May 7, 2018, TeleQuality filed a second revised Sheet No. 30 to further update its rates.

On May 15, 2018, Commission Staff filed its Staff Recommendation in this matter regarding TeleQuality’s tariff filing. Staff recommended that the Commission direct TeleQuality to file a new tariff that is compliant with the 10 day customer notice and 10 day effective date requirements of Section 390.500(2) RSMo. The attached original PSC Mo. No. 4 Tariff is intended to comply with the Recommendation and to supersede all previous PSC Mo. No. 3 Tariff filings in their entirety. For clarity, PSC Mo. No. 4 Tariff reflects the name change of the company, the further updated rates previously filed on May 7, and provides a 10 day effective date. As the tenth day would have fallen on Memorial Day, out of an abundance of caution, the company chose the next business day as the effective date.

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 a copy and returning it to me electronically. Please call me if you have any questions. Thank you again for your assistance.

Very truly yours,

Rose Mulvany Henry

Rose Mulvany Henry
Bradley Arant Boult Cummings LLP
For TeleQuality Communications

Attachments