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June 14, 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 – 1st Revised Sheet No. 30 PSC Mo. No. 4 Tariff

Dear Secretary Woodruff:

TeleQuality Communications, LLC (“TeleQuality”) submits the attached 1st Revised Sheet No. 30 of its PSC Mo. No. 4 Tariff. The revisions to Section 5.1 include adding new bandwidth offerings of 50 Mbps and 1Gbps, and to modify the rate for the 20 Mbps bandwidth offering.

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).

Attached also is a **CONFIDENTIAL**, itemized cost study that demonstrates the new and modified rates are cost-based. Cost information for the other rates shown on this page have previously been submitted.

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.

While TeleQuality recognizes that the Commission may not regulate the services described in this revised tariff page, the Federal Communications Commission has stated that in such circumstance, “We encourage state commissions to review these proposed rates according to procedures and requirements similar to those used for establishing tariffed rates or telecommunications services in their states. . . .” In the Matter of Federal-State Joint Board on Universal Service, Report and Order, CC Docket No. 96-45, FCC 97-157, 12 FCC Rcd 8776 (1997) paragraph 661.

TeleQuality requests a 10-day effective date, consistent with the 10-day customer notice and 10-day effective date requirements of Section 390.500(2) RSMo.

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