

BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

IN THE MATTER OF THE APPLICATION OF)
STATE RURAL UNIVERSAL SERVICE FUND)
2018 SURCHARGE CALCULATION, OR IN) Case No. 17-00202-UT
THE ALTERNATIVE, PER-CONNECTION)
FIXED CHARGE CALCULATION, AND)
FUND SIZE)

RECOMMENDED DECISION

August 16, 2018

I. INTRODUCTION

Commissioner Patrick H. Lyons, Presiding Officer in this case, hereby submits this Recommended Decision to the New Mexico Public Regulation Commission (the “Commission”) pursuant to NMSA 1978, Section 8-8-14 and NMPRC Rules 1.2.2.29.D(4) NMAC and 1.2.2.37.B NMAC. Commissioner Lyons recommends that the Commission adopt the following Statement of the Case, Discussion, Conclusion, and Decretal Paragraphs in the Commission’s dispositive Order.

II. STATEMENT OF THE CASE

In 2017, the New Mexico Legislature amended the New Mexico Rural Telecommunications Act (the “RTA”) to include, among other things, a new provision stating that, as a mechanism to fund the State Rural Universal Service Fund (the “SRUSF”), “[t]he commission may establish the surcharge as a percentage of intrastate retail public telecommunications services revenue or as a fixed amount applicable to each communication connection.” NMSA 1978, § 63-9H-6.B.

Pursuant to the above amendment, the Commission conducted a rulemaking proceeding, Case No. 17-00077-UT, to amend the Commission’s rule for the SRUSF, 17.11.10 NMAC (the “SRUSF Rule”). In the Commission’s Final Order Adopting Rule in Case No. 17-00077-UT, the Commission amended the SRUSF Rule to include, among other things, a provision stating:

The commission shall either set a percentage surcharge rate equal to the annual fund requirement determined by the commission divided by the sum of intrastate retail public telecommunications service revenue, or in the alternative, set a fixed charge applicable to each non-exempt communication connection equal to the annual fund requirement determined by the commission divided by the number of

non-exempt communication connections for all contributing carriers in New Mexico.

17.11.10.20.C NMAC.

On August 30, 2017, in this docket, the Commission issued its Order Amending Title of this Docket and Requesting Information from Contributing Carriers, Staff of the Telecommunications Bureau of the Commission (“Staff”), and Solix, Inc. (the “Fund Administrator”). In that order, the Commission began the process of requesting information from contributing carriers with regard to the consideration and calculation of a potential per-connection charge mechanism for funding the SRUSF.

On the same date, the Commission issued its Order Granting Waivers Concerning Recommendation of SRUSF Surcharge Rate for 2018, waiving portions of the SRUSF Rule that otherwise would have required the Fund Administrator to provide a recommendation for the 2018 SRUSF surcharge rate by September 1, 2017, and would have required the Commission to set such a rate by October 1, 2017. These waivers were issued in light of the then pending Commission rulemaking proceeding, mentioned above.

From September 15, 2017 through September 26, 2017, contributing carriers filed responses to the Commission’s August 30, 2017 order, as well as motions for protective orders concerning allegedly confidential information.

On September 27, 2017, the Commission issued its Order Issuing Protective Order, Extending Deadlines, and Appointing Hearing Examiner. In that order, the Commission, among other things, ordered that the matter be presided over by a hearing examiner but did not name the hearing examiner at that time. The Commission also issued the protective order requested by some of the carriers and, in light of the issuance of the protective order, extended the time for

carriers to respond to the August 30, 2017 order to October 4, 2017, and for Staff and the Fund Administrator to reply to the carriers' responses, to October 24, 2017.

From October 2, 2017 through October 10, 2017, contributing carriers continued to file responses to the Commission's August 30, 2017 order.

On October 16, 2017, the Commission, by single-signature order, designated Frances I. Sundheim as Hearing Examiner in this matter.

On October 26, 2017, Staff filed its Response to Commission Regarding Bench Request Responses File by Carriers Contributing to the SRUSF ("Staff's First Response"). Staff's First Response was supported by the Affidavit of Michael S. Ripperger, Telecommunications Bureau Chief for the Utility Division of the Commission, and the Affidavit of Ken Smith, Economist in the Telecommunications Bureau.

On October 27, 2017, the Fund Administrator filed the Affidavit of Michael Tamburino on Behalf of Solix Inc.

On November 21, 2017, the Fund Administrator filed its SRUSF 2018 Surcharge Calculation and Fund Size.

On November 29, 2017, the Commission issued its Order Setting SRUSF Surcharge Rate for 2018, in which the Commission set the surcharge for 2018 at 6.06% of intrastate revenue and set a SRUSF size for 2018 of \$28,463,924.

On December 19, 2017, the Commission issued, by single-signature order, a Bench Request Order to the Rural Incumbent Local Exchange Carriers (the "Rural ILECs") that receive access reduction support ("ARS") payments from the SRUSF. The Bench Request Order directed the Rural ILECs to provide information concerning any change in their access line counts between December 31, 2014 and December 31, 2016, for the purpose of calculating ARS

payments pursuant to the amended RTA. Responses to the Bench Request Order were received from Rural ILECs from January 11, 2018 through January 17, 2018.

On March 2, 2018, the Hearing Examiner issued her Bench Request to State Rural Universal Service Fund Contributing Carriers. In that request, the Hearing Examiner requested largely the same information that had been requested in the Commission's August 30, 2017 order, but served the request on a more comprehensive list of contributing carriers, based upon information provided by the Fund Administrator. Like the Commission's August 30, 2017 order, the Hearing Examiner's bench request order directed Staff and the Fund Administrator to respond to the information to be provided by the contributing carriers in response to the bench request order.

From March 16, 2018 through May 14, 2018, contributing carriers filed responses to the Hearing Examiner's March 2, 2018 order.

On May 18, 2018, Staff filed its Second Staff Response to Commission Regarding Bench Request Responses Filed by Carriers Contributing to the SRUSF (the "Second Staff Response"). The Second Staff Response was supported by the Affidavit of Ken Smith. The Second Staff Response was also supported by the Affidavit of Judi Ushio on Behalf of GVNW Consulting, Inc. As of March 2018, GVNW Consulting, Inc., had succeeded Solix Inc. as the Fund Administrator.

On May 29, 2018, the New Mexico Exchange Carriers Group ("NMECG"), filed its Request for Status and Scheduling Conference, in which NMECG requested that the Hearing Examiner conduct a status conference to receive input regarding the status of the case and to establish a schedule for further proceedings.

On June 11, 2018, the Hearing Examiner issued her Third Bench Request for Information Regarding the SRUSF. In that bench request order, the Hearing Examiner directed Staff, the Fund Administrator, and NMECG, to provide recommendations as to how to proceed further regarding calculation of a per-connection charge. In addition, the Hearing Examiner directed Staff, the Fund Administrator, and NMECG, to respond to concerns that had been raised in the rulemaking proceeding concerning the legality and propriety of instituting a per-connection charge.

On June 18, 2018, the Hearing Examiner issued her Order Extending Response Date for Third Bench Request and Scheduling a Case Conference. In that order, the Hearing Examiner, among other things, set a case status conference for July 25, 2018. In the meantime, contributing carriers continued to file responses to the Hearing Examiner's March 2, 2018 order.

On July 20, 2018, Staff filed its Response to Third Bench Request for Information Regarding the SRUSF ("Third Staff Response"). The Third Staff Response was supported by the Affidavit of Michael S. Ripperger.

On July 20, 2018, NMECG, CTIA – the Wireless Association ("CTIA"), and Qwest Corporation dba CenturyLink QC, CenturyTel of the Southwest, Inc., CenturyLink Communications, LLC, and Level 3 Communications, LLC (collectively "CenturyLink") filed their responses to the Hearing Examiner's Third Bench Request (respectively, the "NMECG Response" and the "CenturyLink Response").

In July 2018, the Fund Administrator provided information to the Commission's Office of General Counsel showing that revenue for the first six months of 2018 has decreased by an average of 12.73% from the same period in 2017. For the SRUSF to remain fully funded for the remainder of 2018, and to restore the prudent fund balance to \$500,000, the Fund Administrator

projected that a surcharge of 7.37%, as a percentage of intrastate revenue, starting in August 2018, would be required.

On July 25, 2018, the Commission's Office of General Counsel presented the Fund Administrator's findings to the Commission, and the Commission asked that the matter be brought back for consideration at the following week's open meeting. After the open meeting, on July 25, 2018, the Hearing Examiner held the scheduled case status conference, at which a number of participants in this matter discussed a possible expedited hearing procedure.

On August 1, 2018, the Commission issued its Order Relieving Hearing Examiner and Designating Commissioner Patrick H. Lyons to Preside Over Further Expedited Proceedings in This Matter; Order Setting Public Hearing; and Notice of Public Hearing. In that order, the Commission, among other things, designated me as Presiding Officer to conduct a public hearing to receive oral comments and recommendations, as well as supporting documentation, on August 15, 2018. That order provided for a hearing procedure similar to that suggested by the participants in the July 25, 2018 status conference.

Pursuant to the Commission's August 1, 2018 order, notice of the hearing was published in the Albuquerque Journal on August 4, 2018.

On August 15, 2018, I presided over the scheduled and noticed comment hearing, which was concluded the same day. Chairman Sandy Jones of the Commission attended the hearing by telephone. I heard oral comments and response comments from a number of carriers and their representatives, including but not limited to NMECG, CenturyLink, and CTIA; and cable companies such as Time Warner Cable Information Services (New Mexico), LLC, and Comcast; as well as comments from the Fund Administrator and Staff. Supporting documentation was

also received from certain commenters. A court reporter is in the process of preparing a transcript of the hearing, which will include the exhibits provided by certain commenters.

III. DISCUSSION

A. The Legality and Propriety of a Per-Connection Surcharge

In the Hearing Examiner's Third Bench Request for Information Regarding the SRUSF, she identified three areas of potential concern regarding the legality and propriety of instituting a per-connection surcharge. These areas were described as follows:

[1] The current SRUSF methodology is a revenue based contribution mechanism that spreads the burden of the SRUSF across consumers relative to their usage. A connections based methodology would impose identical unitary contribution burdens on all consumers, regardless of their usage or ability to pay.

[2] A connection based methodology provides no method to apply monthly end user surcharges to prepaid plan users that purchase service on an 'as needed' rather than monthly basis. These 'as needed' customers may make their purchases of additional minutes from a variety of third party retailers. These customers do not have a direct and ongoing billing relationship between prepaid wireless customers and their providers. There is no explanation of the method for how per access line surcharges would be assessed and revenues collected from pre-paid wireless services.

[3] A question has been raised regarding how the implementation of a fixed connection charge would remain coordinated with the federal USF methodology – to assure New Mexico assessments neither overlap with nor burden the federal mechanism.

[Third Bench Request, p. 4.]

(i) Alleged “Regressivity” of a Per-Connection Charge

In CTIA’s written response to the Third Bench Request, as well as in CTIA’s (and others’) oral comments at the hearing, CTIA expressed its concern about the legality and propriety of a per-connection surcharge, based upon the issues described above. With regard to the first issue described above, CTIA argued that a per-connection surcharge would function as a “regressive subsidy, effecting a transfer of wealth from the economically disadvantaged to the comparatively better-off by forcing users with low-cost service plans to pay a greater percentage into the SRUSF.” CTIA further argued that “[i]ncreasing the cost of service for parties with lesser means runs directly contrary to the important public policy goal of affordable service that the SRUSF is designed to achieve.” In the Affidavit of Michael S. Ripperger, in support of Third Staff Response, Staff agreed that “a fee based on intrastate revenues is more likely to allocate the burden of payment into the [SRUSF] more equitably than a per-connection fee based on the ability to pay.” CTIA and others provided similar comments at the hearing.

NMECG, however, in the NMECG Response, noted that “[i]n recent years, there has been a significant reduction in the overall amount of intrastate retail telecommunications revenues for Contributing Carriers operating in New Mexico,” resulting in the necessity of annual increases in the percentage surcharge rate. NMECG contends that a per-connection methodology “could be implemented in a fair and equitable manner and result in more stability for the surcharge rate over time.”

In the CenturyLink Response, CenturyLink noted its strong support of a per-connection charge, arguing that “[a] connection-based surcharge ties the4 NMRUSF surcharge to a growing base rather than a declining revenue base.” CenturyLink also contended that the switch to a per-connection charge would “eliminate the impact to the [SRUSF] of revenue shifting between

voice and data,” by wireless companies, a point which was elaborated upon at the hearing. CenturyLink further argued that a per-connection surcharge “is competitively neutral and does not discriminate against providers and customers,” thus complying with the requirements of the RTA, NMSA 1978, § 63-9H-6.C. Indeed, CenturyLink argued that, because the per-connection surcharge would impose an identical charge on all consumers, it would be “more predictable, non-discriminatory, competitively and technologically neutral, and sustainable than the current revenue-based system.”

The comments made by CenturyLink and NMECG, as well as similar comments made at the hearing, are more persuasive than those made by CTIA and others with regard to this issue.

(ii) Alleged Difficulty with Collecting Per-Connection Charge from Prepaid

Customers

In CTIA’s written response to the Third Bench Request, as well as in CTIA’s (and others’) oral comments at the hearing, CTIA expressed its concern that a per-connection charge could not be practicably imposed by the Commission upon prepaid plan users. CTIA noted that “[m]any prepaid carriers lack a direct billing relationship with their customers that purchase top-up or refill cards from third-party retailers to replenish their accounts.” CTIA contended that “without a point-of-sale mechanism, the Commission has no way to collect SRUSF surcharges from these pre-paid end users, thus violating the provision of the [RTA] that requires such collection.”

In the NMECG Response, NMECG argues that “[t]he issue of how to handle the surcharge assessments for prepaid customers is not new.” NMECG continued, “to the best of NMECG’s knowledge, wireless prepaid customers do not pay the surcharge under the current percentage-of-revenue methodology.” NMECG further contended that “[t]he prepaid customer

issue has been addressed and resolved in New Mexico for E-911 surcharges,” (citing NMSA 1978, § 63-9D-5.1. NMECG and CenturyLink further developed at the hearing the notion of using E-911 as a proxy for communication connection counts.

In the CenturyLink Response, CenturyLink argues that “the obligation to pay the [SRUSF] surcharge is on the provider, not the consumer.” CenturyLink further argues that “the Commission need not establish or explain the method for how providers recover the [SRUSF] surcharge from their customers, regardless of whether the Commission uses a revenue-based or connection based surcharge approach.” CenturyLink contends that, “[i]f the prepaid wireless providers wish to collect the surcharge from their customers, Commission rules allow them to determine how best to do that . . .”

The comments made by CenturyLink and NMECG, as well as similar comments made at the hearing, are more persuasive than those made by CTIA and others with regard to this issue.

(iii) Alleged Conflict Between Per-Connection Charge and Federal Universal Service Fund Funding Mechanism

In CTIA’s written response to the Third Bench Request, as well as in CTIA’s (and others’) oral comments at the hearing, CTIA expressed its concern that a per-connection charge “is inconsistent with the federal program and could create illegal overlap with or burden on the federal fund.” CTIA contends that, “[b]ecause the federal universal service program assesses contributions based on revenues, a connections based methodology is facially ‘inconsistent with’ the federal program.” CTIA notes that wireless carriers “allocate intrastate revenues from connections that carry both interstate and intrastate traffic based on the inverse of the factor that they use for federal USF contributions . . .” CTIA concludes that, “[i]f New Mexico uses a

different approach to assessing connections, there is a significant risk that the approach could impose contributions on interstate revenue, violating [47 U.S.C. § 254(f)].”

In the CenturyLink Response, CenturyLink argues that “[a] connection-based surcharge is not dependent on providers’ classification of revenue as either intrastate or interstate, and thus does not rely upon or burden interstate revenues used to determine federal USF support contributions.” CenturyLink further notes that “[c]onnection-based surcharges already exist,” citing the E-911 surcharge, which is currently assessed on a per-connection basis.

The comments made by CenturyLink, as well as similar comments made at the hearing, are more persuasive than those made by CTIA and others with regard to this issue.

B. Setting the Amount of the Per-Connection Surcharge for the Remainder of 2018

At the hearing in this matter, the Fund Administrator provided calculations for potential per-connection surcharges, which calculations are attached to this Recommended Decision as **Exhibit A and Exhibit B** hereto. These exhibits will also be attached to the transcript in this matter. The exhibits provide two different scenarios for recovery of the amounts needed to fund the SRUSF in 2018 and 2019. In this docket, only the per-connection charge for the remainder of 2018 is to be determined. However, Scenario 2 in Exhibit A and Exhibit B provides a method of calculating the per-connection surcharge for 2018 at \$1.17, with a projected potential surcharge for 2019 of \$1.16, which would allow for a smoother transition to a per-connection surcharge for those paying into the SRUSF by potentially avoiding any drastic change in the surcharge from 2018 to 2019.

Scenario 2 would delay collection of \$1.1 million of the total \$5 million program funding for 2019 program awards (which have not yet been awarded by the Commission) until 2019.

This is an acceptable solution as, even if the Commission grants a full \$5 million in awards through the program for 2019, the full \$5 million will not be paid out at the beginning of 2019. Instead, the payments will be made in installments, pursuant to Commission rule 17.11.10.31 NMAC.

Moreover, the Fund Administrator's recommendation of \$1.17 per-connection surcharge for the remainder of 2018 is based upon a conservative estimate of approximately 2.1 million communication connections. Earlier estimates provided in the record of this matter ranged from 2,306,906 communication connections, in the Second Staff Response, to 3,076,880 communication connections in the First Staff Response. Given this variability, as well as potential difficulties that may arise in the first months of implementation of the per-connection charge, the Fund Administrator's conservative estimate is a reasonable one on which to proceed.

Given the variability of estimates of communication connections as well as the novelty of this methodology for collection of the SRUSF, the remainder of 2018 should be considered a transition period for the per-connection surcharge. During this time, it is expected that the Fund Administrator will need to design new reporting forms for contributing carriers, that contributing carriers will need to modify their billing systems, and that some contributing carriers may need to use a readily available proxy for communication connections. For the remainder of 2018, those contributing carriers that are unable to calculate their communication connections for purposes of the SRUSF, NMSA 1978, Section 63-9H-6, should be able to use their New Mexico E-911 counts as a proxy.

In the written comments in this matter, as well as at the hearing, October 1, 2018 was discussed as a potential effective date for implementation of the per-connection surcharge. Some carriers indicated that this date might be too soon for them to change their systems. However,

many carriers indicated that they would be able to implement the change for October 1, 2018. For the benefit of the ratepayers of New Mexico, the earliest reasonable implementation date should be imposed by the Commission. The record indicates that this date is October 1, 2018..

IV. FINDINGS OF FACT AND CONCLUSIONS OF LAW

As Presiding Officer, I recommend that the Commission **FIND** and **CONCLUDE** as follows:

1. The Statement of the Case, Discussion, and all findings and conclusions contained therein, whether separately stated, numbered, or designated as such, are incorporated by reference as findings of fact and conclusions of law of the Commission.
2. The Commission has jurisdiction over the participants and the subject matter of this case.
3. Reasonable and proper notice of this case has been provided.
4. A per-communication connection surcharge to fund the SRUSF is allowed by and in compliance with the RTA, NMSA 1978, Section 63-9H-6, and the Commission's SRUSF Rule, 17.11.10 NMAC.
5. A per-communication connection surcharge to fund the SRUSF will not burden the federal mechanism for funding the federal Universal Service Fund and will not otherwise conflict with federal law.
6. The per-communication connection surcharge should be set at \$1.17, effective October 1, 2018, through the remainder of 2018. This period should be considered a transition period, during which contributing carriers may use their New Mexico E-911 connection counts as a proxy for their communication connections for the SRUSF.

V. DECRETAL PARAGRAPHS

Based on the foregoing Findings of Fact and Conclusions of Law, the Presiding Officer recommends that the Commission **ORDER** that:

A. The Statement of the Case, Discussion, and all Findings of Facts and Conclusions contained herein are hereby adopted and approved as the findings, conclusions, rulings, and determinations of the Commission.

B. A per-communication connection surcharge of \$1.17 shall be implemented as the funding mechanism for the SRUSF, effective October 1, 2018, through the remainder of 2018.

C. Any matter not specifically ruled upon during the hearing or in this Order is disposed of consistent with this Order.

D. Copies of this Order shall be mailed to all persons on the attached Certificate of Service.

E. This Order is effective immediately.

F. This docket is closed.

I S S U E D at Santa Fe, New Mexico this 16th day of August 2018.

NEW MEXICO PUBLIC REGULATION COMMISSION



COMMISSIONER PATRICK H. LYONS

Exhibit A

Scenario 1 - Recover in 2018	
Assessments	
2018 Funding Requirement	28,863,924.25
Actual Collected (As of 6/30/18)	13,372,072.88
Average Monthly Assessments	2,228,678.81
Months Remaining	3
Projected Assessments 10/1/18	<u>\$ 20,058,109.31</u>
Remaining Funding Requirement for 10/1 - 12/31/18	<u>\$ 8,805,814.94</u>

Scenario 2 - Recover in 2019	
Assessments	
2018 Funding Requirement / Deficit recovered in 2019	27,763,924.25
Actual Collected (As of 6/30/18)	13,372,072.88
Average Monthly Assessments	2,228,678.81
Months Remaining	3
Projected Assessments 10/1/18	<u>\$ 20,058,109.31</u>
Remaining Funding Requirement for 10/1 - 12/31/18	<u>\$ 7,705,814.94</u>

Connections	
No. of Connections	2,309,087
-5% Variance	(115,454)
Proj. Monthly Line Count	2,193,633
Months Remaining in plan year	3
Funding Requirement	<u>\$ 8,805,814.94</u>
Per Connection Rate Requirement	<u>\$ 1.34</u>
Rate w/ \$400,000 prudent fund bal.	1.32
Rate w/ \$300,000 prudent fund bal.	1.31
Rate w/ \$200,000 prudent fund bal.	1.29
Rate w/ \$100,000 prudent fund bal.	1.28
Rate w/ \$0.00 prudent fund bal.	1.26

Per Connection Rate Calculation:

Funding Requirement
Proj. Monthly Line Count x Months Remaining in plan year

Funding Requirement Calculation - Scenario 1

Funding Requirement	Annual
Estimated Support	\$19,767,340.16
Need Support	\$1,400,000.00
Estimated LITAP	\$300,000.00
Broadband	\$5,000,000.00
True-Ups (60 Months)	\$1,819,801.87
Administration	\$136,100.00
Legal Fees	\$50,000.00
External Audit	\$25,000.00
FCC Freeze Payments	\$365,682.22
Sub Total	\$28,863,924.25

Connections	
No. of Connections	2,309,087
-5% Variance	(115,454)
Proj. Monthly Line Count	2,193,633
Months Remaining in plan year	3
Funding Requirement	<u>\$ 7,705,814.94</u>
Per Connection Rate Requirement	<u>\$ 1.17</u>

Per Connection Rate Calculation:

Funding Requirement
Proj. Monthly Line Count x Months Remaining in plan year

Funding Requirement Calculation - Scenario 2

Funding Requirement	Annual
Estimated Support	\$19,767,340.16
Need Support	\$1,400,000.00
Estimated LITAP	\$300,000.00
Broadband	\$3,900,000.00
True-Ups (60 Months)	\$1,819,801.87
Administration	\$136,100.00
Legal Fees	\$50,000.00
External Audit	\$25,000.00
FCC Freeze Payments	\$365,682.22
Sub Total	\$27,763,924.25

Note: Assumes a \$1.1 million shortage of the broadband fund to be recovered in 2019

Exhibit B

2019 Funding Requirement \$28,345,774.87

2019 Funding Requirement Recovering BB/Deficit \$29,245,774.87

Scenario 1 - Recover in 2018	
Connections	
No. of Connections	2,309,087
-8% Variance	(184,727)
Proj. Monthly Line Count	2,124,360
Months Remaining in plan year	12
Funding Requirement	\$ 28,345,774.87
Per Connection Rate Requirement	<u>\$ 1.11</u>

Scenario 2 - Recover in 2019	
Connections	
No. of Connections	2,309,087
-8% Variance	(184,727)
Proj. Monthly Line Count	2,124,360
Months Remaining in plan year	12
Funding Requirement	\$ 29,445,774.87
Per Connection Rate Requirement	<u>\$ 1.16</u>

Per Connection Rate Calculation:

Funding Requirement	
Proj. Monthly Line Count x Months Remaining in plan year	
Funding Requirement	Annual
Estimated Support	\$18,914,873.00
Need Support	\$1,400,000.00
Estimated LITAP	\$500,000.00
Broadband	\$5,000,000.00
True-Ups (60 Months)	\$1,819,801.87
Administration	\$136,100.00
Legal Fees	\$50,000.00
External Audit	\$25,000.00
Cash Reserves	\$500,000.00
Sub Total	\$28,345,774.87

Per Connection Rate Calculation:

Funding Requirement	
Proj. Monthly Line Count x Months Remaining in plan year	
Funding Requirement	Annual
Estimated Support	\$18,914,873.00
Need Support	\$1,400,000.00
Estimated LITAP	\$500,000.00
Broadband	\$6,100,000.00
True-Ups (60 Months)	\$1,819,801.87
Administration	\$136,100.00
Legal Fees	\$50,000.00
External Audit	\$25,000.00
Cash Reserves	\$500,000.00
Sub Total	\$29,445,774.87

Note: Broadband Requirement for 2019 is \$6.1 million due to an estimated \$1.1 million shortfall in 2018.

BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

**IN THE MATTER OF THE STATE)
RURAL UNIVERSAL SERVICE FUND)
2018 SURCHARGE CALCULATION) Case No. 17-00202-UT
AND FUND SIZE)**

CERTIFICATE OF SERVICE

I CERTIFY that on this day I sent to the following contributing carriers listed below,
via email only, a true and correct copy of the **Recommended Decision**.

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DATED this 16th day of August 2018.

NEW MEXICO PUBLIC REGULATION COMMISSION


Elizabeth Ramirez, Law Clerk