

# **Benefits of NECA Pooling**

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### Agenda

Cost recovery/Pool protection

Cash flow

Report obligations/rules compliance

Other pooling considerations



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### Cost recovery

- Predicting future costs and revenue has proven quite challenging for many members
- Recent regulatory changes, buildout requirements and FCC Orders/NPRM will increase this challenge
- Pool risk sharing minimizes the effects of inaccurate forecasting on individual pool members



#### Cost recovery Example

Inaccurate special access RRQ forecasting

	In the pool	Out of the pool
Forecast RRQ	\$1,000,000	\$1,000,000
Actual RRQ (cost study)	\$1,250,000	\$1,250,000
Settlement	\$1,250,000	N/A
Net balance from pool	\$250,000	N/A
Total cost recovery	\$1,250,000	\$1,000,000



# Cash flow stability

- Pooling helps protect against significant cash flow disruptions
  - For example, disruptions from cost forecast misses and unexpected demand/revenue loss
- Pooling helps protect members by smoothing out cash flow timing difference between settlement net balances and USF payments
- Pooling allows companies to realize the authorized RoR more quickly for Common Line and TS Switched



# Cash flow stability

	Forecast RRQ	Forecast Revenue	Actual Revenue	Pool Net Balance	Cash Flow In Pool	Cash Flow Out Pool
Jul 22	\$5,000	\$5,000	\$5,000	\$0	\$5,000	\$5,000
Aug 22	\$5,000	\$5,000	\$5,000	\$0	\$5,000	\$5,000
Sep 22	\$5,000	\$5,000	\$4,800	\$200	\$5,000	\$4,800
Oct 22	\$5,000	\$5,000	\$4,600	\$400	\$5,000	\$4,600
Nov 22	\$5,000	\$5,000	\$4,500	\$500	\$5,000	\$4,500
Dec 22	\$5,000	\$5,000	\$4,200	\$8,00	\$5,000	\$4,200
Jan 23	\$5,000	\$5,000	\$4,100	\$900	\$5,000	\$4,100
Feb 23	\$5,000	\$5,000	\$4,000	\$1,000	\$5,000	\$4,000
Mar 23	\$5,000	\$5,000	\$3,900	\$1,100	\$5,000	\$3,900
Apr 23	\$5,000	\$5,000	\$3,800	\$1,200	\$5,000	\$3,800
May 23	\$5,000	\$5,000	\$3,700	\$1,300	\$5,000	\$3,700
Jun 23	\$5,000	\$5,000	\$3,600	\$1,400	\$5,000	\$3,600

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# Cash flow stability

- Pooling helps mitigate cash flow disruptions that may result from forecast errors affecting CAF BLS and CAF ICC support
  - CAF BLS payments are based on forecasts
    - Final true-up to actuals occurs 30 months later
  - For pool members, cash flow associated with an increase from forecasted CAF BLS RRQ will be realized immediately
  - For companies outside the pool, cash flow associated with an increase from forecasted CAF BLS RRQ could be delayed by as much as 30 months



### Reporting obligations/rules compliance

- NECA prepares or helps facilitate the preparation of mandatory data collections and files that data on behalf of its pool members
- Companies that leave the pool must spend considerable time and/or thirdparty expense to manage these increasingly complex filings on their own
  - CAF ICC filings and true-ups
  - Form 508 and 509 CAF BLS filings
  - Other data collections



### Reporting obligations/rules compliance

- Recent changes have increased the burden of FCC rules compliance
- NECA provides assistance in helping to assure data submitted to FCC is in compliance with Commission rules
- NECA conducts training and provides timely communication to keep our members up to date on rules and reporting changes
- NECA provides support in provisioning data, reports and explanations necessary for audits by USAC and others



# Other pooling considerations

- Pooling and tariff enhancements allow companies to establish competitive rates in a manner similar to those companies outside the pool
  - Rate band buy down options offer pricing flexibility
  - Enhanced tariff discount programs help you better respond to RFPs, including E-Rate options
  - ETS MM-VCC options allow for attractive DSL pricing
  - New flexible discount plan based on a per port basis for Ethernet services
  - Rate band assignments are yielding lower contributions
  - Tariffs are keeping pace with emerging technology



### Other pooling considerations

- Pooling and tariff enhancements allow companies to establish competitive rates in a manner similar to those companies outside the pool
  - CBOL rate tariffing flexibility
  - Special access earnings are stable



### Thank you for participating today!



You will receive an evaluation via email within 24 to 48 hours. Please take a moment to complete it and provide us with your feedback.



#### Acronyms

- CAF BLS
  Connect America Fund Broadband Loop Support
- CAF ICC Connect America Fund Intercarrier Compensation
- E-EVC Extended Ethernet Virtual Connection
- ETS Ethernet Transport Service
- ETS BAO Ethernet Transport Service Bandwidth Add-on
- ETS MM-VCC ETS Multi-Media Virtual Circuit Channel
- FCC Federal Communications Commission
- I-EVC Interconnected Ethernet Virtual Connection
- ILEC Incumbent Local Exchange Carrier
- NECA National Exchange Carrier Association
- RFP Request for Pricing
- RRQ
  Revenue Requirement
- SPA Special Access
- SWC Serving Wire Center



# Acronyms

- TDP
  Term Discount Plan
- TP Test Period

