



ACCEPTED/FILED

APR 19 2013

Federal Communications Commission  
Office of the Secretary

April 15, 2013

RE: Mandatory Data Collection for Special Access, WC Docket No. 05-25, FCC 12-153 \*

Chariton Valley Telephone Corporation expresses its concern that the Mandatory Data Collection of APPENDIX A of the FCC 12-153 document would be excessively burdensome and costly to our company. These comments respond to the FCC's solicitation of comment on the burdens associated with the information collection adopted by the special access order released in December 2012. Information Collection(s) Being Reviewed by the Federal Communications Commission, Comments Requested, 78 Fed. Reg. 9911 (released Feb. 12, 2013).

As a small rural carrier we do not have the staff to complete such a data request in addition to the already burdensome reporting requirements of the USF/ICC Reform Order and the old reporting requirements of the FCC and the Missouri Public Service Commission.

Small carriers like us do not have sophisticated mapping systems to be able to produce the maps as described. We do not have the detail nor do many of us have electronic maps. We do not have large engineering staffs (typically there is one engineer) and would have to incur the costs of an outside engineering firm to produce the mandatory request. In the wave of the reform order and an already uncertain financial future, additional costs are just not feasible.

Business rules of individual companies are highly confidential and proprietary. Revealing rules, marketing plans, and notice of winning bids to RFPs is not a practice any competitive carrier will be willing to voluntarily provide. To mandate that we submit such information could jeopardize competition and our survival.

Rates for Special Access Services can be found in ILEC tariffs. It is duplicative to ask that the same information be submitted again when we are already operating with limited staffing.

It is doubtful that small carriers, like us, have kept track of the data in such a manner that it would be conducive to reporting it in the format as requested without advance notice. We do not have our own programming departments and rely on billing systems designed by a third party.

Special Access Revenue is less than 5% of our total revenue. In the next five –ten years we will see the effects of the ICC/USF reform order and it will become a larger % of our revenue. But the data request is too far reaching and will cause a large amount of expense for our company.

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We ask that the FCC put additional waivers in for small carriers. We simply do not have the sophisticated billing and mapping systems to provide what the data requested. And it will be ridiculously costly to acquire the services of outside consultants. The data request is simply too costly and burdensome on companies who are already strained from the USF/ICC Reform Order.

Tina Jordan  
Director of Finance  
Chariton Valley Telephone Corporation

*\*Special Access for Price Cap Local Exchange Carriers; WC Docket No. 05-25; AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services, RM 10593, Report and Order and Further Notice of Proposed Rulemaking, FCC 12-153 (released Dec. 18, 2013) (Order).*

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**From:** Tina Jordan <TJordan@charitonvalley.com>  
**Sent:** Monday, April 15, 2013 12:15 PM  
**To:** PRA  
**Cc:** JSimon@charitonvalley.com  
**Subject:** WC Docket No. 05-25, FCC 12-153 Chariton Valley Telephone Corporation Comments  
**Attachments:** WC Docket No 05-25 FCC12-153 Chariton Valley.pdf

Please accept the attached as comments filed in response to the Information Collection(s) Being Reviewed by the Federal Communications Commission, Comments Requested, 78 Fed. Reg. 9911.

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