

Data Request 1
Docket TC-12-105
BullsEye Telecom, Inc

Supplemental Response to 1-4:

- 1-4) To the extent BullsEye relied on any estimates in its calculations, please provide justification for those estimates.

Response:

Reliable demand data by rate element is not available for FY2011. Where an individual intrastate rate element was already lower than the corresponding interstate rate element, the company left that rate element unchanged. Where the interstate rate element did not have an intrastate equivalent (e.g. Common Trunk Port, Common Multiplexing), the element was NOT added to the intrastate rates. For all other rate elements, the company reduced the intrastate rate by half the difference between the interstate and intrastate rate. These three reduction “rules” result in a lower intrastate rate than would otherwise be allowed under the FCC Order. In addition to the actual computation spreadsheet, enclosed is a hypothetical demand spreadsheet showing a lesser reduction required where actual revenue is utilized.

The demand data contemplated in the FCC order is not provided to BullsEye in an easily usable format. Manual calculations would be required and some estimates would still be necessary. Faced with the prospect of doing this on a nationwide scale, it was determined that the manhours required to derive what would be still questionable data, was simply not feasible. On that basis, BullsEye has made a good faith effort to comply with state requirements, including those of South Dakota as full as possible. Where needed, the company erred on the conservative side as explained above.