

June 15, 2025

Steve Kahl
Executive Secretary
Public Service Commission
600 East Boulevard Avenue – Dept. 408
Bismarck, ND 58505-0480

Re: Annual Reporting Requirements for Recipients of CAF/ICC Pursuant to 47 C.F.R.
§51.917(d)(vii),(e),(f) and 47 C.F.R. §54.304 (d)(1)

Dear Mr. Kahl:

The Federal Communications Commission's (FCC) November 18, 2011 USF/ICC Transformation Order, FCC 11-161 (WC Docket No. 10-90) requires carriers seeking recovery through the federal mechanisms established in the Order to make certain certifications to the FCC and to state commissions regarding their eligibility for, and their compliance with the rules applicable to such recovery.

Specifically, 47 C.F.R. §51.917(d)(vii), (e), (f) requires Rate of Return Carriers to certify annually to the FCC and to the relevant state commissions that the carrier is not seeking duplicative recovery in the state jurisdiction of any Eligible Recovery subject to the recovery mechanism. In compliance with that requirement, Loretel Systems, Inc. hereby states that it is not seeking duplicative recovery in the state jurisdiction for any Eligible Recovery, and as required by 47 C.F.R. §51.917(e)&(f) that has complied with all eligibility requirements and is eligible to receive the projected support requested. Included as Attachment A is a copy of the Officer Certifications filed with the FCC as part of the National Exchange Carrier Association (NECA) compliance filing.

The FCC's November 18, 2011 USF/ICC Transformation Order, FCC 11-161 (WC Docket No. 10-90) also requires rate of return carriers seeking CAF/ICC support to file data establishing the amount of the rate of return carrier's eligible CAF/ICC funding per 47 C.F.R. §54.304 (d) (1). Included in Attachment B, is the projected Access Recovery Support and Connect America Fund Support as filed with the FCC under this Order.

Please contact the undersigned if you need further information.

Sincerely,



Thomas W. Campbell
Telecommunications Consultant

Enclosures

1 PU-25-206 Filed 06/13/2025 Pages: 7
Copy of FCC 47CFR Section 54.304 CAF ICC Annual
Support Data - Redacted

Loretel Systems, Inc.
Thomas Campbell, Telecommunications Cons

June 15, 2025

Depend on our people. Count on our advice.SM

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Please contact the undersigned if you need further information.

Sincerely,



Thomas W. Campbell
Telecommunications Consultant

Enclosures

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ATTACHMENT B

TY2025-2026 CAF ICC Summary

Rate-of-Return (ROR) Carrier Revenue Requirement

- 1 2011 Interstate Switched Access Revenue Requirement
- 2 FY 2011 Intrastate Terminating Switched Access Revenues
- 3 FY 2011 Net Reciprocal Compensation Revenues
- 4 2011 ROR Carrier Base Period Revenue (Line 1 + Line 2 + Line 3)
- 5 ROR Carrier Baseline Adjustment Factor (0.95 ^ 14)
- 6 ROR Carrier Revenue Requirement (Line 4 x Line 5)
- 7 Pool Administration Expenses
- 8 Total ROR Carrier Revenue Requirement (Line 6 + Line 7)

Revenues from Reformed Intercarrier Compensation (ICC Rates)

- 9 Interstate Switched Access Revenues
- 10 Interstate Allocated Switched Access Revenues
- 11 Transitional Intrastate Access Service Revenues
- 12 Net Transitional Reciprocal Compensation Revenues
- 13 Total ICC Revenue (Line 10 + Line 11 + Line 12)

Eligible Recovery

- 14 TRS Increment
- 15 Regulatory Fees Increment
- 16 NANPA Increment
- 17 Interstate Local Switching Support for Price Cap Affiliates
- 18 Adjustment for Double Recovery or Corrections
- 19 Test Period 23/24 True Up - Net impact on Total Eligible Recovery
- 20 Eligible Recovery (Line 8 - Line 13) + (Line 14 + Line 15 + Line 16 + Line 18 + Line 19) - (Line 17)

Revenues from Access Recovery Charges (ARC)

- 21 Residential ARC Revenues
- 22 Single Line Business ARC Revenues
- 23 Multi-Line Business ARC Revenues
- 24 Total ARC Revenues (Line 21 + Line 22 + Line 23)

Connect America Fund (CAF) ICC Support (Line 20 - Line 24)

- 25 Connect America Fund (CAF) ICC Support (Line 20 - Line 24)

Revised CAF ICC Support with Imputed ARC Revenues for Broadband-Only Loops

- 26 ARC Revenue Adjustment
- 27 **Adjusted Test Period 2024-2025 CAF ICC Support (Line 25 - Line 26)**

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ATTACHMENT A

TO BE COMPLETED BY THE REPORTING CARRIER,

Certification of Officer as to the Accuracy of the CAF ICC Data Reported

I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the actual data reported; and, to the best of my knowledge, the information reported on this form is accurate.

Name of Reporting Carrier **Loretel Systems, Inc.**

Signature of Authorized Officer 

Date **6/4/25**

Printed name of Authorized Officer **Staci Malikowski**

Title or position of Authorized Officer **Chief Financial Officer**

Telephone number of Authorized Officer: **(218) 346-8498**, ext.

Study Area Code of Reporting Carrier **361443**

Filing Due Date for this form
(mm/dd/yyyy)

Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

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ATTACHMENT A

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING DATA ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Data Reported on Behalf of Reporting Carrier

I certify that (Name of Agent) Moss Adams LLP is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the data provided to the Authorized Agent; and, to the best of my knowledge, the actual data provided to the Authorized Agent are accurate.

Name of Authorized Agent Moss Adams LLP

Name of Reporting Carrier Loretel Systems, Inc.

Signature of Authorized Officer 

Date 6/4/25

Printed name of Authorized Officer Staci Malinkowski

Title or position of Authorized Officer Chief Financial Officer

Telephone number of Authorized Officer: (218) 346-8498 ext. _____

Study Area Code of Reporting Carrier 361443

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ATTACHMENT A

TO BE COMPLETED BY AN OFFICER OF THE REPORTING CARRIER

Certification of Officer for Rate-of-Return Carrier Not Seeking Duplicative Recovery

I certify that I am an officer of the reporting carrier and that, to the best of my knowledge, this reporting carrier is not seeking duplicative recovery in the state jurisdiction for any Eligible Recovery subject to the recovery mechanism as per 51.917(d)(vii).

Name of Reporting Carrier **Loretel Systems, Inc.**

Signature of authorized officer 

Date **6/4/25**

Printed name of authorized officer **Staci Malikowski**

Title or position of authorized officer **Chief Financial Officer**

Telephone number of authorized officer: **(218) 346-8498**

Study Area Code of Reporting Carrier **361443**

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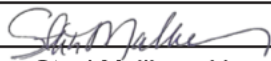
ATTACHMENT A

TO BE COMPLETED BY AN OFFICER OF THE REPORTING CARRIER

Certification of Officer for Rate-of-Return Carrier Eligibility for CAF/ICC Recovery

I certify that I am an officer of the reporting carrier and that, to the best of my knowledge, the reporting carrier on this form certifies that it has complied with Eligible Recovery §51.917(d) and Access Recovery Charge §51.917(e) and is eligible to receive the CAF ICC support requested pursuant to §51.917(f).

Name of Reporting Carrier **Loretel Systems, Inc.**

Signature of authorized officer  Date **6/4/25**

Printed name of authorized officer **Staci Malikowski**

Title or position of authorized officer **Chief Financial Officer**

Telephone number of authorized officer: **(218) 346-8498**

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