

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of
TeleQuality Communications, LLC
File No.: EB-IHD-19-00028870
Acct. No.: 202032080016
FRN: 0016004012

ORDER

Adopted: February 5, 2020

Released: February 5, 2020

By the Chief, Enforcement Bureau:

1. The federal Rural Health Care (RHC) Program ensures that eligible rural health care providers have access to the telecommunications necessary to deliver essential health care services to families and individuals living and working in rural and remote parts of the country.

1 See 47 U.S.C. §§ 254(h)(1)(A), (h)(2)(A).

2 See 47 CFR §§ 54.603, 54.605, 54.609, and 54.615 (2018). In August 2019, the Commission revised the rules governing the Telecommunications Program (Telecom Program) to simplify calculation of the rural rate, reform competitive bidding in the RHC Program, and provide more clarity regarding RHC Program procedures.

3 See 47 CFR §§ 1.1154, 52.17, 52.32, 54.706 through 54.713, 64.601 and 64.604 (2018).

4 The RHC Program includes two subprograms: the Telecom Program and the Healthcare Connect Fund. The Telecom Program provides support for the difference between the rural and urban rates for telecommunications services.

may end up paying more for necessary medical services or forgoing them altogether. The Commission's rules governing the RHC Program⁵ are vital to protecting the program and its limited resources from waste, fraud, and abuse.

2. To settle this matter, TeleQuality admits, for the period of at least January 1, 2015, through December 31, 2018, to (a) using fabricated sales quotes as urban rates; (b) assisting health care providers in creating bid evaluation criteria and bid matrices during the competitive bidding period, and in responding to information requests from the Universal Service Administrative Company (USAC) in contravention of RHC Program rules; (c) providing improper incentives to health care providers to encourage the awarding of contracts to TeleQuality; (d) failing to determine its rural rates in accordance with section 54.607 of the Commission's rules; and (e) invoicing USAC and receiving payment for telecommunications services it did not provide to health care providers. TeleQuality further admits, for the period from January 1, 2010 to April 30, 2019, to failing to file accurate Telecommunications Reporting Worksheets (FCC Form 499-As) and failing to make required contributions payments. TeleQuality agrees to a settlement value of \$31,000,000, and to implement enhanced compliance measures in connection with its participation in the RHC Program and its required contributions obligations.⁶ This action will help further the Commission's goal of supporting as many health care providers as possible in the delivery of health care services to their rural communities.

3. After reviewing the terms of the Consent Decree and evaluating the facts before us, including the cooperation of Education Networks of America⁷ in the investigation and remediation of these violations, and the need to ensure rural health care providers do not experience a gap in critical services, we find that the public interest would be served by adopting the Consent Decree and terminating the referenced investigation regarding TeleQuality's compliance with the RHC Program rules.

4. In the absence of material new evidence relating to this matter, we do not set for hearing the question of TeleQuality's basic qualifications to hold or obtain any Commission license or authorization.⁸

5. Accordingly, **IT IS ORDERED** that, pursuant to the authority delegated by Sections 0.111 and 0.311 of the Commission's rules,⁹ the attached Consent Decree **IS ADOPTED** and its terms incorporated by reference.

6. **IT IS FURTHER ORDERED** that the above-captioned matter **IS TERMINATED** in accordance with the terms of the attached Consent Decree.

⁵ See 47 CFR §§ 54.600-54.680 (2018).

⁶ See 47 CFR §§ 1.1154, 52.17, 52.32, 54.706 through 54.713, 64.601 and 64.604 (2018).

⁷ In January 2018, TeleQuality was acquired by Education Networks of America, Inc. (ENA). In connection with the acquisition, ENA brought TeleQuality under ENA's overall management and ultimately installed a new management team at TeleQuality, including a new General Manager, in April 2019.

⁸ See 47 CFR § 1.93(b).

⁹ 47 CFR §§ 0.111, 0.311.

7. **IT IS FURTHER ORDERED** that a copy of this Order and Consent Decree shall be sent by first class mail and certified mail, return receipt requested, to Kathryn K. Ganier, General Counsel, TeleQuality Communications, LLC, 21202 Gathering Oak, San Antonio, TX 78260; John T. Nakahata, Harris, Wiltshire & Grannis, LLP, 1919 M Street, NW, Suite 800, Washington, DC 20036; and Richard E. Wiley, Wiley Rein, LLP, 1776 K Street, Washington, DC 20006.

FEDERAL COMMUNICATIONS COMMISSION

Rosemary C. Harold
Chief
Enforcement Bureau

Before the
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Washington, D.C. 20554

In the Matter of
TeleQuality Communications, LLC
File No.: EB-IHD-19-00028870
Acct. No.: 202032080016
FRN: 0016004012

CONSENT DECREE

1. The federal Rural Health Care Program (RHC Program) provides essential funding support to rural health care providers, facilitating access to the telecommunications services, broadband and other advanced telecommunications and information services necessary for the provision of health care in rural communities. The Federal Communications Commission's (Commission or FCC) rules governing the RHC Program are vital to protecting the program and its resources from waste, fraud, and abuse.

2. The Commission's Enforcement Bureau (Bureau) and TeleQuality Communications, LLC (together with its predecessor, TeleQuality Communications, Inc.), by their authorized representatives, hereby enter into this Consent Decree for the purposes of terminating the Bureau's investigation into whether TeleQuality violated the Commission's RHC Program rules governing competitive bidding, the determination of rural rates, the determination of urban rates, as well as the Commission's Contribution rules. TeleQuality Communications, LLC is the successor to TeleQuality Communications, Inc., which was the program participant through January 2, 2018. As set forth herein, to resolve this matter, TeleQuality admits, for the period of at least January 1, 2015, through December 31, 2018, to: (a) using fabricated sales quotes as urban rates; (b) assisting health care providers in creating bid evaluation criteria and bid matrices during the competitive bidding period, and in responding to information requests from the Universal Service Administrative Company (USAC) in contravention of RHC Program rules; (c) providing improper incentives to health care providers to encourage the awarding of contracts to TeleQuality; (d) failing to determine its rural rates in accordance with section 54.607 of the Commission's rules and, at least with respect to some requests, failing to determine its urban rates in accordance with Section 54.605 of the Commission's rules; and (e) invoicing USAC and receiving payment for telecommunications services it did not provide to health care providers. TeleQuality further admits, for the period from January 1, 2010 to April 30, 2019, to failing to file accurate Telecommunications Reporting Worksheets (FCC Form 499-As) reporting its actual interstate telecommunications revenues and failing to make required Contributions payments. TeleQuality agrees to a settlement value of \$31,000,000, and to implement enhanced compliance measures in connection with its participation in the RHC Program. This Consent Decree sanctions TeleQuality for its conduct in seeking and receiving RHC Program funds to which it was not entitled and for failing to pay its required Contributions obligations.

1 See 47 CFR §§ 54.600-54.680 (2018).

2 See 47 CFR §§ 1.1154, 52.17, 52.32, 54.706 through 54.713, 64.601 and 64.604 (2018).

I. DEFINITIONS

3. For the purposes of this Consent Decree, the following definitions shall apply:
- (a) “Act” means the Communications Act of 1934, as amended.³
 - (b) “Adopting Order” means an order of the Bureau adopting the terms of this Consent Decree without change, addition, deletion, or modification.
 - (c) “Bureau” means the Enforcement Bureau of the Federal Communications Commission.
 - (d) “Commission” and “FCC” mean the Federal Communications Commission and all of its bureaus and offices.
 - (e) “Communications Laws” means collectively, the Act, the Rules, and the published and promulgated orders and decisions of the Commission.
 - (f) “Compliance Plan” means the compliance obligations, program, and procedures described in this Consent Decree at paragraph 20.
 - (g) “Contributions” means payments to one or more of the following funding mechanisms: USF, TRS, NANPA, LNPA, and/or FCC Interstate Telecommunications Service Provider regulatory fees, as required by Title 47, Code of Federal Regulations, sections 1.1154, 52.17, 52.32, 54.706 through 54.713, and 64.604, and sections 9, 225, 251, 254, and 715 of the Act.
 - (h) “Contribution rules” means Title 47, Code of Federal Regulations, sections 1.1154, 52.17, 52.32, 54.706 through 54.713, and 64.604, sections 9, 225, 251, 254, and 715 of the Act, and Commission orders related to preserving and advancing universal service, interstate telecommunications relay services, the administration of the North American Numbering Plan, the shared costs of local number portability administration and contributing to these funds, and assessment of Commission regulatory fees.
 - (i) “Covered Employees” means all employees and agents of TeleQuality who perform, supervise, oversee, or manage the performance of, duties that relate to TeleQuality’s responsibilities under the Communications Laws, including the RHC Program rules and the Contribution rules.
 - (j) “Education Networks of America” or “ENA” means Education Networks of America, Inc., and its predecessors in interest and successors in interest. Education Networks of America is the parent company of TeleQuality Communications, LLC.
 - (k) “Effective Date” means the date by which both the Bureau and TeleQuality have signed the Consent Decree.
 - (l) “Investigation” means the investigation commenced by the Bureau in File No. EB-IHD-18-00028281, investigating “violations of the Communications Act of 1934, as amended, and the Commission’s rules and orders governing the provision of telecommunications services in connection with the Rural Health Care Program (RHC Program) ... and receipt of support payments in connection with same by TeleQuality Communications, Inc. (TeleQuality) as a participant in the RHC

³ 47 U.S.C. § 151, *et seq.*

Program of the Universal Service Fund (USF).”⁴

- (m) “Letter of Inquiry” or “LOI” means the Letter of Inquiry issued to TeleQuality by the Enforcement Bureau on December 28, 2018.
- (n) “Operating Procedures” means the standard internal operating procedures and compliance policies established by TeleQuality to implement the Compliance Plan.
- (o) “Parties” means TeleQuality and the Bureau, each of which is a “Party.”
- (p) “Person” shall have the same meaning as defined in section 3(39) of the Communications Act, as amended, 47 U.S.C. § 153(39).
- (q) “Rules” means the Commission’s regulations found in Title 47 of the Code of Federal Regulations.
- (r) “RHC Program rules” means Title 47, Code of Federal Regulations, sections 54.600-54.680, section 254 of the Act, and Commission orders related to the provision of service in the RHC Program.
- (s) “TeleQuality” or “Company” means TeleQuality Communications, LLC, Education Networks of America, Inc., ENA Services, LLC and their predecessors in interest and successors in interest, including TeleQuality Communications, Inc.
- (t) “USAC” means the Universal Service Administrative Company, which serves as the administrator for the federal Universal Service Fund (USF or Fund).⁵

II. BACKGROUND

4. The RHC Program provides financial support to enable eligible health care providers to implement the modern telecommunications systems that are vital to 21st century medical care.⁶ Through the RHC Program, health care providers may apply for USF support for eligible services only by making a request for services from eligible service providers; seeking competitive bids for services eligible for support through a fair and open competitive bidding process; selecting the most cost-effective method for receiving the requested services; and complying with any other applicable state, local, or other procurement requirements.⁷ The fair and open competitive bidding requirement is a significant safeguard to protect the RHC Program and USF from waste, fraud, and abuse, and ensures that health care providers

⁴ Letter of Inquiry to TeleQuality (Dec. 28, 2018) at 1.

⁵ See 47 CFR § 54.701 (2018).

⁶ The RHC Program includes two subprograms: the Telecommunications Program (Telecom Program) and the Healthcare Connect Fund. The Telecom Program provides support for the difference between the rural and urban rates for telecommunications services. See *Promoting Telehealth in Rural America*, Report and Order, 34 FCC Rcd 7335, 7433 (2019) at para. 4; *Federal-State Joint Board on Universal Service*, Report and Order, 12 FCC Rcd 8776, 9111-9112 (1997). The Healthcare Connect Fund promotes the use of broadband services and the formation of health care consortia by providing a 65% discount on an array of advanced telecommunications and information services such as Internet access, dark fiber, business data, traditional Digital Subscriber lines, and private carriage services. See *Promoting Telehealth in Rural America*, Report and Order, 34 FCC Rcd 7335, 7433 (2019) at para. 4; See also *Rural Healthcare Support Mechanism*, Report and Order, 27 FCC Rcd 16678 (2012) (establishing the Healthcare Connect Fund). Although the Consent Decree references the RHC Program generally, the apparent rule violations at issue in this Consent Decree primarily concern the Telecom Program. See 47 CFR §§ 54.603-625 (2018).

⁷ 47 CFR §§ 54.602, 54.603, 54.615, 54.642 (2018).

choose the most cost-effective bid so that USF funds are used wisely and efficiently.⁸

5. Through the Telecom Program,⁹ eligible rural health care providers can obtain rates for supported services that are no higher than the “urban rate,” defined as “a rate no higher than the highest tariffed or publicly-available rate charged to a commercial customer for a functionally similar service in any city with a population of 50,000 or more in that state”¹⁰ The carrier providing the eligible service(s) must provide services at the urban rate, and is entitled to support payments from the Fund to account for the difference between the urban rate and the rural rate (the rate for telecommunications services provided to commercial customers in rural areas, which is generally higher than the urban rate).¹¹

6. Service providers and health care providers can obtain and use urban rates from several sources.¹² One source is USAC’s website, which contains a list of acceptable urban rates.¹³ A health care provider must submit documentation of the urban rate to USAC.¹⁴ USAC uses the urban and rural rates to determine, among other things, the appropriate support payments from the Fund.¹⁵

7. The Commission’s Rules establish three, and only three, methods for a service provider to determine its rural rate. These methods must be considered in sequence based on the factual circumstances.¹⁶ The first method (Method 1) must be considered if the service provider itself offers

⁸ See *In the Matter of Rural Health Care Support Mechanism*, Order, 22 FCC Rcd 20360, 20412, paras. 101-02. (2007). See also *Federal-State Joint Board on Universal Service*, Report and Order, 12 FCC Rcd 8776, 9076, paras. 480, 686, 688 (1997) (requiring a competitive bidding processes for eligible schools and libraries and eligible health care providers requiring that descriptions of services be posted “so that potential providers can see and respond to them”).

⁹ In August 2019, the Commission revised the rules governing the Telecom Program to simplify calculation of the rural rate, reform competitive bidding in the RHC Program, and provide more clarity regarding RHC Program procedures. The revised competitive bidding rules and gift rules take effect in funding year 2020 and the revised rural rate rules will take effect in funding year 2021. See generally *Promoting Telehealth in Rural America*, Report and Order, 34 FCC Rcd 7335, 7433 (2019) at para. 214. Until the revised RHC Program rules take effect, the Commission’s current rules are binding on TeleQuality’s conduct. The description of the Telecom Program herein refers to the Commission’s rules in effect at the time of the Company’s actions described herein, prior to funding year 2020.

¹⁰ 47 CFR §§ 54.605, 54.613 (2018). The urban rate is no greater than the rate provided for services over a distance equal to the “standard urban distance”, or “the average of the longest diameters of all cities with a population of 50,000 or more within the state.” 47 CFR § 54.605 (2018).

¹¹ 47 CFR §§ 54.602, 54.609 (2018). See generally 47 U.S.C. § 254(h)(1)(A); *Rural Health Care Support Mechanism*, Report and Order, Order on Reconsideration, and Further Notice of Proposed Rulemaking, 18 FCC Rcd 24546 (2003) (*2003 Order and Further Notice*).

¹² See generally *Promoting Telehealth in Rural America*, Report and Order, 34 FCC Rcd 7335, 7433 (2019) at para. 41.

¹³ *Id.*

¹⁴ 47 CFR § 54.605 (2018) (describing how to calculate the urban rate based on publicly-available information); see *Rural Health Care Support Mechanism*, WC Docket No. 02-60, Order, 30 FCC Rcd 230, 231, paras. 2-3 (WCB 2015) (requiring applicants to submit all supporting documentation, including proof of the urban rate, on FCC Form 466). See also *Telecom Program: Urban and Rural Rates, Urban Rate Documentation*, USAC, <http://www.usac.org/res/documents/rhc/pdf/handouts/TelecomRuralUrbanRateInfo.pdf> (last visited Sep. 12, 2019).

¹⁵ See 47 CFR § 54.609 (2018).

¹⁶ See *Updated Frequently Asked Questions on Universal Service for Rural Health Care Providers*, 12 FCC Rcd 13429, 13433 at part IV, Calculating Amount of Support, Question Nos. 19 - 21 (1997). See also 47 CFR § 54.607 (2018); *The Wireline Competition Bureau Provides Guidance Regarding the Commission’s Rules For Determining*

comparable services to non-health care provider customers in the same rural area.¹⁷ If so, the Commission's Rules require that a service provider's rural rate must "be the average of the rates actually being charged to commercial customers, other than health care providers, for identical or similar services provided by the telecommunications carrier providing the service in the rural area in which the health care provider is located."¹⁸

8. Where the telecommunications carrier "is not providing any identical or similar services in the rural area," the second method (Method 2) must be considered:¹⁹ "[T]he rural rate shall be the average of the tariffed and other publicly available rates, not including any rates reduced by universal service programs, charged for the same or similar services in that rural area over the same distance as the eligible service by other carriers."²⁰

9. The last and final method (Method 3) must be considered only if there are no tariffed or publicly available rates for such services in that rural area, or if the carrier reasonably determines that this method for calculating the rural rate is unfair.²¹ In such cases, "then the carrier shall submit for the state commission's approval, for intrastate rates, or the Commission's approval, for interstate rates, a cost-based rate for the provision of the service in the most economically efficient, reasonably available manner."²² Where a carrier seeks approval of a state commission for intrastate rates or the Commission for interstate rates, "a justification of the proposed rural rate, including an itemization of the costs of providing the requested service" is required.²³

10. The Communications Act requires that the Commission establish mechanisms to fund universal service (USF), interstate telecommunications relay services (TRS), the North American

Rural Rates in the Rural Health Care Telecommunications Program, WC Docket No. 02-60, DA-19-92 (WCB Feb. 15, 2019).

¹⁷ See *Updated Frequently Asked Questions on Universal Service for Rural Health Care Providers*, 12 FCC Rcd 13429, 13433 at part IV, Calculating Amount of Support, Question Nos. 19 - 21 (1997). See also 47 CFR § 54.607(a) (2018); *The Wireline Competition Bureau Provides Guidance Regarding the Commission's Rules For Determining Rural Rates in the Rural Health Care Telecommunications Program*, WC Docket No. 02-60, DA-19-92 (WCB Feb. 15, 2019).

¹⁸ 47 CFR § 54.607(a) (2018). The rates averaged to calculate the rural rate must not include any rates reduced by universal service support mechanisms. *Id.* A service provider may consider its pre-discount prices for services provided to E-rate customers in determining its rural rates. See *The Wireline Competition Bureau Provides Guidance Regarding the Commission's Rules For Determining Rural Rates in the Rural Health Care Telecommunications Program*, WC Docket No. 02-60, DA-19-92 (WCB Feb. 15, 2019) at 4.

¹⁹ See *Updated Frequently Asked Questions on Universal Service for Rural Health Care Providers*, 12 FCC Rcd 13429, 13433 at part IV, Calculating Amount of Support, Question Nos. 19 - 21 (1997). See also 47 CFR § 54.607(b) (2018); *The Wireline Competition Bureau Provides Guidance Regarding the Commission's Rules For Determining Rural Rates in the Rural Health Care Telecommunications Program*, WC Docket No. 02-60, DA-19-92 (WCB Feb. 15, 2019).

²⁰ 47 CFR § 54.607(b) (2018).

²¹ See *Updated Frequently Asked Questions on Universal Service for Rural Health Care Providers*, 12 FCC Rcd 13429, 13433 at part IV, Calculating Amount of Support, Question Nos. 19 - 21 (1997). See also 47 CFR § 54.607(b) (2018); *The Wireline Competition Bureau Provides Guidance Regarding the Commission's Rules For Determining Rural Rates in the Rural Health Care Telecommunications Program*, WC Docket No. 02-60, DA-19-92 (WCB Feb. 15, 2019).

²² 47 CFR § 54.607(b) (2018).

²³ 47 CFR § 54.607(b)(1) (2018).

Numbering Plan (NANPA), and the shared costs of local number portability administration (LNPA).²⁴ The Commission funds these programs through assessments on providers of interstate telecommunications.²⁵ The Commission requires telecommunications carriers and certain other providers of telecommunications (including Voice-over-Internet-Protocol (VoIP)) to report each year on the FCC Form 499-A the revenues they receive from offering service.²⁶ The administrators of each of these programs use these reported revenues to calculate and assess any necessary contributions.²⁷ With very limited exceptions, all intrastate, interstate, and international providers of telecommunications in the United States must file FCC Form 499-As, and many must also contribute to the USF, TRS, NANPA, and LNPA.²⁸ The Commission also utilizes Form 499-As to calculate and assess annual regulatory fees.²⁹

11. TeleQuality is a provider of telecommunications services, information services, and VoIP services³⁰ in connection with the RHC Program and is authorized to do business in 48 states.³¹ The Company participates in, and services rural health care facilities through, both the RHC Program's Telecom Program and the Healthcare Connect Fund Program.³² TeleQuality does not provide services to commercial customers outside of the RHC Program.³³ TeleQuality provides both intrastate and interstate telecommunications services and VoIP³⁴ and is required to accurately report its revenues on its FCC Form 499-As, and to contribute to USF, TRS, NANPA, and LNPA, and to pay FCC regulatory fees based on those revenues. In January 2018, TeleQuality was acquired by Education Networks of America, Inc. (ENA). In connection with the acquisition, ENA brought TeleQuality under ENA's overall management and ultimately installed a new management team at TeleQuality, including a new General Manager, in April 2019.

12. On December 28, 2018, the Commission issued a Letter of Inquiry (LOI) to TeleQuality, initiating an investigation into TeleQuality's business practices in connection with its participation in the RHC Program.³⁵ The investigation focused on TeleQuality's conduct during the RHC Program's competitive bidding process, TeleQuality's rural rate determinations, and the Company's compliance with the Commission's urban rate rules.

²⁴ 47 U.S.C. §§ 225, 251, 254, 715.

²⁵ See 2019 Instructions to the Telecommunications Reporting Worksheet, FCC Form 499-A at 2.

²⁶ See 47 CFR 52.17(b), 52.32(b), 54.708, 54.711, 64.604(c)(5)(iii)(A)-(B) (2018).

²⁷ See 2019 Instructions to the Telecommunications Reporting Worksheet, FCC Form 499-A at 2.

²⁸ See 47 CFR 52.17(b), 52.32(b), 54.706, 54.708, 54.711, 64.604(c)(5)(iii)(A)-(B) (2018). See also 2019 Instructions to the Telecommunications Reporting Worksheet, FCC Form 499-A at 2-5.

²⁹ See 47 CFR 1.1154.

³⁰ See TeleQuality's Initial Response to the LOI (Jan. 29, 2019) at Response to Request 10.

³¹ See TeleQuality's Initial Response to the LOI (Jan. 29, 2019) at Response to Requests 3-4.

³² See generally TeleQuality's Initial Response to the LOI (Jan. 29, 2019).

³³ See TeleQuality's Initial Response to the LOI (Jan. 29, 2019) at Response to Request 15.

³⁴ See TeleQuality's Initial Response to the LOI (Jan. 29, 2019) at Response to Request 10.

³⁵ Letter of Inquiry from Rakesh Patel, Enforcement Bureau, FCC to Tim Koxlien, Chief Executive Officer, TeleQuality (Dec. 28, 2018) (on file in EB-IHD-18-00028281) (LOI).

13. In response to the LOI, TeleQuality retained outside counsel to conduct an investigation and subsequently made a series of disclosures and document productions to the Bureau³⁶ supporting multiple violations of the Commission's rules, including:

A. Violations of the RHC Program Rules governing the competitive bidding process.

- From at least 2015 through 2017, TeleQuality repeatedly assisted rural health care providers in the construction of bid analysis documents and instructed rural health care providers to alter bid evaluation criteria in a way that would increase the likelihood that TeleQuality would win RHC Program contracts.
- In an internal Company e-mail exchange, a TeleQuality employee stated “I’m thinking [REDACTED] [sic] might actually need to refile their 465. Why, you ask? Because we wouldn’t win if they used the bid matrix that is on their current 465.”³⁷ TeleQuality employees induced [REDACTED], a health care provider, to post a second Form 465. This new Form 465 reflected amended bid criteria that reduced the weight given to the cost of the proposals from 40% to 30%.³⁸
- In connection with a different rural health care provider, TeleQuality employees assisted in the creation of [REDACTED]’s bid matrix, reviewed drafts of the matrix during the competitive bidding period, and provided changes that were adopted by [REDACTED].³⁹ At the suggestion of TeleQuality employees, [REDACTED] lowered the weighting of the cost component and added additional criteria which favored TeleQuality.⁴⁰
- A TeleQuality employee advised [REDACTED] on how to respond to a competitor company’s inquiry received by [REDACTED] during the 28-day competitive bidding period.⁴¹
- TeleQuality’s Funding Specialist requested and received a competitor’s quote from [REDACTED] during the 28-day competitive bidding period. In forwarding the vendor’s quote, the [REDACTED] employee stated: “Thank you [Tara] for

³⁶ TeleQuality provided the Enforcement Bureau with an overview of its apparent rule violations on April 8, 2019 and May 17, 2019, and provided an overview of its Contributions violations to the Enforcement Bureau and the Wireline Competition Bureau (WCB) on September 19, 2019, and its over invoicing violations on October 8, 2019 (TeleQuality Briefing).

³⁷ See Conversation with Ricky Lopez, Sales Associate, TeleQuality involving Natalie Verette, Director of Operations/Sales, TeleQuality (Apr. 20, 2017), TQLOI_0000428.

³⁸ Compare FY2017 FCC Form 465, HCP No. 38352 (Jan. 9, 2017) with FY2017 FCC Form 465, HCP No. 38352 (Apr. 24, 2017).

³⁹ See E-mail from [REDACTED] to Tara Nordstrom, TeleQuality (Aug. 22, 2016), TQLOI_0000278; see also Conversation with Tara Nordstrom, Funding Specialist, TeleQuality involving Ricky Lopez, Sales Associate, TeleQuality (Aug. 22, 2016), TQLOI_0000452 (Nordstrom: “would you like to review the bid matrix with me”; Lopez “yes”).

⁴⁰ See E-mail from Tara Nordstrom, Funding Specialist, TeleQuality to Ricky Lopez, Sales Associate, TeleQuality (Aug. 22, 2016) (suggesting awarding TeleQuality 10 points for cost instead of 25; including factors such as customer reference factor and personal visit), TQLOI_0000379. See also E-mail from [REDACTED] to Ricky Lopez, Sales Associate TeleQuality (Aug. 26, 2016) (attaching a bid matrix implementing TeleQuality’s suggested changes), TQLOI_0000456.

⁴¹ See E-mail from [REDACTED] to Ricky Lopez, Sales Associate, TeleQuality (Aug. 23, 2016) (“Hey Ricky, what should I tell her? Both? Thank you again for all your help.”), TQLOI_0000182-0000186.

always helping us out with all of this. Here is the quote of the other vendor.”⁴² TeleQuality’s Funding Specialist then asked a TeleQuality sales associate if he wanted to review the competitor’s quote to which the sales associate replied, “yep.”⁴³

- In other instances, after TeleQuality won contracts from rural health care providers, these providers received information requests from USAC concerning the competitive bidding process through which these contracts were awarded. On numerous occasions, TeleQuality assisted in the construction of, and/or reviewed, bid-related documents that were only created after USAC sought such documents and well after the contracts at issue were awarded (*post facto* bid matrices),⁴⁴ to give USAC the false impression that proper bid analyses were performed at the time award decisions were made for contracts awarded to TeleQuality.
- Through mid-2016, TeleQuality initiated a sales promotion in which the Company provided free routers valued between \$800 and \$2,000, and firewalls valued between \$3,000 and \$4,000, to health care providers to induce these providers to award contracts to the Company.⁴⁵
- TeleQuality offered health care providers below market discounts on their telecommunications services at non-rural sites. TeleQuality then recouped the losses from those below-market rates by improperly inflating its rates on the rural sites which were supported by the USF.⁴⁶

B. Violations of the Commission’s rules governing the determination of urban rates.

- Purported Level 3 Communications, Inc. (Level 3) sales quotes provided by TeleQuality to USAC to support the Company’s urban rates were forged by TeleQuality employees in 2015 and 2016. These sales quotes were not issued by Level 3, whose name and logo appeared on the sales quotes.⁴⁷
- These sales quotes were wholesale fabrications by TeleQuality employees and were not based on rates charged by Level 3.⁴⁸ A TeleQuality employee who previously worked for Level 3 forged Level 3’s letterhead, and

⁴² See E-mail from [REDACTED] to Tara Nordstrom, TeleQuality (Aug. 22, 2016), TQLOI_0000222.

⁴³ See Conversation with Tara Nordstrom, Funding Specialist, TeleQuality involving Ricky Lopez, Sales Associate, TeleQuality (Aug. 22, 2016), TQLOI_0000452.

⁴⁴ See, e.g., TeleQuality’s Fifth Response to LOI, TeleQuality Summary (“questionable”) (Apr. 9, 2019).

⁴⁵ See, e.g., E-mail from Chris Morgan, Sales Associate, TeleQuality to [REDACTED] and [REDACTED] (Mar. 18, 2016), TQLOI_0000755.

⁴⁶ See, e.g., E-mail from William Anderwald, TeleQuality to Ricky Trotter, TeleQuality (Mar. 18, 2015), TQLOI_0156566.

⁴⁷ See Letter of Inquiry from Rakesh Patel, Enforcement Bureau, FCC to John Benedict, CenturyLink Communications (Apr. 12, 2019) (CenturyLink LOI). CenturyLink Communications acquired Level 3 Communications, Inc. on November 1, 2017. See News Releases, “CenturyLink completes acquisition of Level 3,” <http://news.centurylink.com/2017-11-01-CenturyLink-completes-acquisition-of-Level-3> (last visited Oct. 21, 2019).

⁴⁸ See Response of CenturyLink to LOI (Apr. 12, 2019) (CenturyLink LOI Response).

misrepresented Level 3's rates to USAC.

- USAC relied upon these fabricated and forged urban rate documents to calculate payments TeleQuality received from the USF. TeleQuality misled USAC, resulting in the Company receiving substantially more USF support than that to which it was entitled.
- TeleQuality was aware as early as November 2017 that these sales quotes were likely invalid.⁴⁹ There is no evidence that TeleQuality made any significant effort to verify the authenticity of the sales quotes with the carrier at that time.
- TeleQuality relied on its own service in Texas, indirectly supported through RHC support, to establish an urban rate. This was not a proper basis for doing so.⁵⁰ TeleQuality disclosed that this practice likely predated Funding Year 2017.
- TeleQuality also initially submitted some Funding Year 2017 urban rates based on insufficient documents, and likely did so for years prior to Funding Year 2017. TeleQuality subsequently provided revised urban rates to USAC for Funding Year 2017.⁵¹

C. Violations of the Commission's rules governing the determination of rural rates.

- TeleQuality provides both intrastate and interstate telecommunications services but does not have commercial customers outside of the RHC Program.⁵² As such, TeleQuality must determine its rural rates using Method 2 or Method 3 but repeatedly failed to use either one of these methods.⁵³
- When requested by USAC and the Commission to identify which rural rate method TeleQuality used to calculate its rates for Funding Year 2016 and Funding Year 2017, the Company proffered publicly available rates and tariffs to substantiate approximately 414 of its funding requests under Method 2—averaged publicly available and tariffed rates—and, for some intrastate services, Method 3 (cost-based rates approved by a state commission). For at least 341 of these 414 funding requests, the publicly-available rates and tariffs were filed *after* the Company set the rural rate, sometimes by more than one year.
- TeleQuality also represented to USAC and the Commission that it was determining its rural rates for over 350 other funding requests for Funding Year 2017 in accordance with Method 3—interstate rates requiring Commission approval.⁵⁴ In connection with these funding requests,

⁴⁹ See e.g., E-mail from William Anderwald, TeleQuality to Tara Nordstrom, TeleQuality (Nov. 10, 2017), TQLOI_0000849.

⁵⁰ See TeleQuality Production of May 22, 2019; TeleQuality Production of May 17, 2019.

⁵¹ See TeleQuality Production of May 22, 20219.

⁵² See TeleQuality's Initial Response to the LOI (Jan. 29, 2019).

⁵³ See 47 CFR §54.607 (2018).

⁵⁴ See TeleQuality's Sixth Response to the LOI (Apr. 12, 2019).

TeleQuality had not obtained Commission approval prior to relying on these rates, and did not seek FCC approval of interstate rates during Funding Year 2015 and Funding Year 2016, and in prior years.

D. Violations of the Commission's rules concerning Contributions.

- In completing its Form 499-As, TeleQuality improperly classified substantially all of its revenues as intrastate.⁵⁵ TeleQuality failed to properly report its interstate telecommunications revenues on its Form 499-As, which caused USAC to not fully invoice TeleQuality for its required contribution payment obligations and enabled TeleQuality to avoid making the full contributions payments required from 2010 to 2018.

E. Invoicing USAC for uninstalled or disconnected services.

- From 2015 to 2017, TeleQuality submitted inaccurate invoices to USAC and received more USF support than that to which it was entitled based on those inaccurate invoices in three respects.⁵⁶ First, TeleQuality submitted invoices to USAC and received payments for service it did not provide or for charges it did not assess to the end user. Second, TeleQuality did not reduce its requested support for circuits that were disconnected prior to the end of the support period. Third, TeleQuality invoiced USAC and received payment for services that had not been installed during the support period.

III. TERMS OF AGREEMENT

14. **Adopting Order.** The provisions of this Consent Decree shall be incorporated by the Bureau in an Adopting Order.

15. **Jurisdiction.** For purposes of this Consent Decree, TeleQuality agrees that the Bureau has jurisdiction over the Company and the matters contained in this Consent Decree and has the authority to enter into and adopt this Consent Decree.

16. **Effective Date.** The Parties agree that this Consent Decree shall become effective on the Effective Date as defined herein. As of the Effective Date, the Parties agree that the Adopting Order and this Consent Decree shall have the same force and effect as any other order adopted by the Commission. Any violation of the Adopting Order or of the terms of this Consent Decree shall constitute a separate violation of a Commission order, entitling the Commission to exercise any rights and remedies attendant to the enforcement of a Commission order. The Bureau has relied on disclosures and factual representations made to the Bureau and Commission by TeleQuality. If the Bureau determines that TeleQuality made any material misrepresentation or material omission relevant to the resolution of this Investigation, the Bureau retains the right to seek modification of this Consent Decree and retains the right to pursue any other remedies available to the Commission under its rules.

17. **Termination of Investigation.** In express reliance on the covenants and representations in this Consent Decree, based on the acquisition by ENA of the rights and obligations of TeleQuality, the cooperation of ENA in the investigation and remediation of these violations, and in light of the need to ensure rural health care providers do not experience a gap in critical services, the Bureau agrees to terminate the Investigation. Nevertheless, the Bureau explicitly recognizes TeleQuality's programmatic violations described herein as egregious, wide-ranging, and unacceptable. Thus, this Consent Decree should not be interpreted as the Commission condoning TeleQuality's violations of RHC Program Rules.

⁵⁵ See, e.g., TeleQuality 2017 FCC Form 499-A (May 2, 2017).

⁵⁶ See, e.g., E-mail from John Nakahata, Harris, Wiltshire & Grannis LLP, to Elizabeth Drogula, Wireline Competition Bureau, Federal Communication Commission, et al. (Oct. 31, 2019).

In consideration for the termination of the Investigation, TeleQuality agrees to the terms, conditions, and procedures contained herein. The Bureau further agrees that, in the absence of material misrepresentations, material omissions, or new material evidence, it will not use the facts developed in the Investigation through the Effective Date, or the existence of this Consent Decree, to institute, on its own motion, any new proceeding, formal or informal, or take any action on its own motion against TeleQuality concerning the matters that were the subject of the Investigation, including (1) the 2015-2018 practices described in paragraphs 2 and 13 of this Consent Decree and disclosed in response to the LOI,⁵⁷ and (2) any such practices that occurred prior 2015, unless such practices were required to be disclosed in response to the LOI and were not so disclosed. This Consent Decree also resolves all claims for repayment to the Universal Service Fund arising from (1) the 2015-2018 practices described in paragraphs 2 and 13 of this Consent Decree and disclosed in response to the LOI,⁵⁸ and (2) any such practices that occurred prior to 2015, unless such practices were required to be disclosed in response to the LOI and were not so disclosed. This Consent Decree does not terminate any other investigations that have been or might be conducted by other law enforcement agencies or offices. This Consent Decree also does not terminate any ongoing reviews conducted by the FCC's Wireline Competition Bureau⁵⁹ and USAC with respect to any matters other than those resolved above in this paragraph.⁶⁰

18. **Admission of Liability.** TeleQuality admits for the purpose of this Consent Decree and for the Commission's civil enforcement purposes, and in express reliance on the provisions of paragraph 17 herein, that its actions in paragraph 13 violated sections 1.1154, 52.17, 52.32, 54.605, 54.607, 54.613, 54.615, 54.706, 54.711, and 64.604(c)(iii)(5)(A)-(B) of the Commission's rules⁶¹ and sections 9, 225, 251, 254, and 715 of the Communications Act, and that it accepts sole responsibility for those actions.⁶²

19. **Compliance Officer.** In the event it has not already done so, within thirty (30) calendar days after the Effective Date, TeleQuality shall designate a senior corporate manager with the requisite corporate and organizational authority to serve as a Compliance Officer and to discharge the duties set forth below. TeleQuality will notify the Enforcement Bureau of the name of the individual so designated and will advise the Enforcement Bureau upon any change in such designation.⁶³ The person designated as the Compliance Officer shall be responsible for developing, implementing, and administering the Compliance Plan and ensuring that TeleQuality and its employees comply with the terms and conditions

⁵⁷ See Appx. D.

⁵⁸ See Appx. D. This Consent Decree also resolves the impact of the disclosed 2015 to 2018 conduct on underlying multiyear contracts, except that, for contracts underlying the funding requests listed in Appx. B, the parties agree that no support payments will be made.

⁵⁹ The Wireline Competition Bureau completed its review of TeleQuality's Funding Year 2017 Method 3 interstate rates on December 23, 2019. See Letter of Elizabeth Drogula, Deputy Chief, Telecommunications Access Policy Division to John Nakahata, Counsel to TeleQuality Communications, LLC (Dec. 23, 2019) (WCB December 23, 2019 Letter). Its review of TeleQuality's Funding Year 2018 Method 3 interstate rates remains ongoing. TeleQuality's funding requests that were or are subject to the Wireline Competition Bureau's review are listed in Appx. C.

⁶⁰ See Appx. D. USAC will continue to review TeleQuality's funding requests for Funding Years 2017 and 2018 with regard to any violations of the Commission's rules not included in the Investigation, and in accordance with the WCB December 23, 2019 Letter. As of the Effective Date, the Enforcement Bureau's Investigation is complete. See *id.*

⁶¹ See 47 CFR §§ 1.1154, 52.17, 52.32, 54.605, 54.607, 54.613, 54.615, 54.706, 54.711, 64.604(c)(5)(iii)(A)-(B) (2018).

⁶² 47 U.S.C. §§ 159, 225, 251, 254, 616.

⁶³ Notification shall be made to Rakesh Patel, Chief, Fraud Division, Enforcement Bureau, Federal Communications Commission, Room 3-C365, 445 12th Street, SW, Washington, DC 20554, or his successor or designee, with a copy submitted electronically to Rakesh Patel at Rakesh.Patel@fcc.gov.

of the Compliance Plan and this Consent Decree. In addition to the general knowledge of the Communications Laws necessary to discharge his or her duties under this Consent Decree, the Compliance Officer shall have specific knowledge of the RHC Program rules and the Contribution rules prior to assuming his/her duties. The Compliance Officer shall have no duties or functions related to the sales or marketing of TeleQuality's services in connection with the RHC Program and will report independently to ENA's General Counsel. The Compliance Officer will have final authority within TeleQuality on the Company's compliance practices.

20. **Compliance Plan.** For purposes of settling the matters set forth herein, TeleQuality agrees that it shall, within sixty (60) calendar days after the Effective Date, develop and implement a Compliance Plan designed to ensure future compliance with the Communications Laws and with the terms and conditions of this Consent Decree. TeleQuality will provide the Enforcement Bureau with a draft of this plan for its review and approval within forty-five (45) calendar days of the Effective Date. With respect to the RHC Program rules and Contribution rules, TeleQuality will implement, at a minimum, the following procedures:

- (a) **Operating Procedures.** Within sixty (60) calendar days after the Effective Date, TeleQuality shall establish Operating Procedures that all Covered Employees must follow to help ensure TeleQuality's compliance with the RHC Program rules and Contribution rules. TeleQuality's Operating Procedures shall include internal procedures and policies specifically designed to ensure a separation of functions between sales, finance, and compliance. TeleQuality's Operating Procedures shall include operating procedures and policies to ensure TeleQuality's operations comply with RHC Program rules and Contribution rules, and data retention policies to ensure preservation of RHC Program participation records for the period required under Commission rules. TeleQuality shall also develop a Compliance Checklist that describes the steps that a Covered Employee must follow to ensure compliance with the RHC Program rules and Contribution rules. The Compliance Officer shall ensure that Covered Employees adhere to the Operating Procedures and utilize the Compliance Checklist.
- (b) **Compliance Manual.** Within sixty (60) calendar days after the Effective Date, the Compliance Officer shall develop and distribute a Compliance Manual to all Covered Employees. The Compliance Manual shall explain the RHC Program rules and Contribution rules and set forth the Operating Procedures that Covered Employees shall follow to help ensure TeleQuality's compliance with these rules. TeleQuality shall periodically review and revise the Compliance Manual as necessary to ensure that the information set forth therein remains current and accurate. The Compliance Officer shall ensure that Covered Employees comply with the requirements of the Compliance Manual. TeleQuality shall distribute any revisions to the Compliance Manual promptly to all Covered Employees.
- (c) **Compliance Training Program.** TeleQuality shall establish and implement a Compliance Training Program on compliance with the RHC Program rules and Contribution rules and the Operating Procedures. As part of the Compliance Training Program, Covered Employees shall be advised of TeleQuality's obligation to report any noncompliance with the RHC Program rules and the Contribution rules under paragraph 21 of this Consent Decree and shall be instructed on how to disclose noncompliance to the Compliance Officer. All Covered Employees shall be trained pursuant to the Compliance Training Program within seventy-five (75) calendar days after the Effective Date, except that any person who becomes a Covered Employee at any time after the initial Compliance Training Program shall be trained within thirty (30) calendar days after the date such person becomes a Covered Employee. TeleQuality shall repeat compliance training on an annual basis and shall periodically review and revise the Compliance Training Program as necessary to ensure that it remains current and

complete, and to enhance its effectiveness. The Compliance Officer shall ensure that all Covered Employees certify that they received Compliance Training and will abide by the requirements at time of hire and thereafter annually.

- (d) **Staff Review.** Within sixty (60) calendar days after the Effective Date, TeleQuality will review all TeleQuality personnel for suitability for their positions in a compliant organization and terminate the employment of any employee found not suitable for continued employment within ninety (90) calendar days after the Effective Date.
- (e) **Refiling of Forms 499-A.** Within sixty (60) calendar days after the Effective Date, TeleQuality will amend its 2016, 2017, 2018, and 2019 Form 499-As (reporting revenues for calendar years 2015, 2016, 2017, and 2018, respectively).

21. **Reporting Noncompliance.** TeleQuality shall report any noncompliance with the RHC Program rules and Contribution rules, and with the terms and conditions of this Consent Decree, within fifteen (15) calendar days after discovery of such noncompliance. Such reports shall include a detailed explanation of: (i) each instance of noncompliance; (ii) the steps that TeleQuality has taken or will take to remedy such noncompliance; (iii) the schedule on which such remedial actions will be taken; and (iv) the steps that TeleQuality has taken or will take to prevent the recurrence of any such noncompliance. The Compliance Officer must maintain a log of all reports received and shall identify the date and time the report was received, the name of the person making the report, details about the reported conduct or activities, and actions TeleQuality plans to take to address the report. The logs shall be provided to the FCC upon request. All reports of noncompliance shall be submitted to Rakesh Patel, Chief, Fraud Division, Enforcement Bureau, Federal Communications Commission, Room 3-C365, 445 12th Street, SW, Washington, DC 20554, or his successor or designee, with a copy submitted electronically to Rakesh Patel at Rakesh.Patel@fcc.gov.

22. **Compliance Reports.** TeleQuality shall file compliance reports with the Commission ninety (90) calendar days after the Effective Date, six (6) months after the Effective Date, twelve (12) months after the Effective Date, twenty-four (24) months after the Effective Date, thirty-six (36) months after the Effective Date, forty-eight (48) months after the Effective Date, and sixty (60) months after the Effective Date.

- (a) Each Compliance Report shall include a detailed description of TeleQuality's efforts during the relevant period to comply with the terms and conditions of this Consent Decree, the RHC Program rules and Contribution rules. In addition, each Compliance Report shall include a certification by the Compliance Officer, as an agent of and on behalf of TeleQuality, stating that the Compliance Officer has personal knowledge that TeleQuality: (i) has established and implemented the Compliance Plan; (ii) has utilized the Operating Procedures since the implementation of the Compliance Plan; and (iii) is not aware of any instances of noncompliance with the terms and conditions of this Consent Decree, including the reporting obligations set forth in paragraph 21 of this Consent Decree.
- (b) The Compliance Officer's certification shall be accompanied by a statement explaining the basis for such certification and shall comply with section 1.16 of the Commission's rules and be subscribed to as true under penalty of perjury in substantially the form set forth therein.⁶⁴
- (c) If the Compliance Officer cannot provide the requisite certification, the Compliance Officer, as an agent of and on behalf of TeleQuality, shall provide the Commission with a detailed explanation of the reason(s) why and describe fully: (i) each instance of noncompliance; (ii) the steps that TeleQuality has taken or will take to remedy such

⁶⁴ 47 CFR § 1.16 (2018).

noncompliance, including the schedule on which proposed remedial actions will be taken; and (iii) the steps that TeleQuality has taken or will take to prevent the recurrence of any such noncompliance, including the schedule on which such preventive action will be taken.

- (d) All Compliance Reports shall be submitted to Rakesh Patel, Chief, Fraud Division, Enforcement Bureau, Federal Communications Commission, Room 3-C365, 445 12th Street, SW, Washington, DC 20554, or his successor or designee, with a copy submitted electronically to Rakesh Patel at Rakesh.Patel@fcc.gov.

23. **Termination Date.** Unless stated otherwise, the requirements set forth in this Consent Decree shall expire sixty-one (61) months after the Effective Date (Termination Date).

24. **Section 208 Complaints; Subsequent Investigations.** Nothing in this Consent Decree shall prevent the Commission or its delegated authority from adjudicating complaints filed pursuant to section 208 of the Act⁶⁵ against TeleQuality or its affiliates for alleged violations of the Act, or for any other type of alleged misconduct, regardless of when such misconduct took place. The Commission's adjudication of any such complaint will be based solely on the record developed in that proceeding. Except as expressly provided in this Consent Decree, this Consent Decree shall not prevent the Commission from investigating new evidence of noncompliance by TeleQuality with the Communications Laws.

25. **Settlement Amount.** TeleQuality agrees to a Settlement Amount of \$31,000,000 (Settlement Amount) to fully resolve the Investigation.

- (a) TeleQuality will repay \$19,047,112 (Repayment Amount)⁶⁶ to the USF in installments through offsets of its USF disbursements (Installment Payment). Each Installment Payment shall consist of a minimum of \$1.00 for every \$3.00 of the disbursements authorized by USAC to be disbursed to TeleQuality from the USF. TeleQuality agrees to pay a Minimum Annual Installment Payment (Minimum Annual Payment) for each Year (12-month intervals beginning on the Effective Date) following the Effective Date of the Consent Decree as follows:

- Year 1 – Payment of \$9,047,112
 - Year 2 – Payment of \$2,500,000
 - Year 3 – Payment of \$2,500,000
 - Year 4 - Payment of \$2,500,000
 - Year 5 - Payment of \$2,500,000
- i. Any Minimum Annual Payment Amount unpaid at the end of a Year shall be paid to USAC by TeleQuality within thirty days of the end of the Year. If TeleQuality satisfies its Minimum Annual Payment Amount for a particular Year, the remaining Installment payments for the Year will be suspended and will resume in the following Year.
- ii. TeleQuality hereby grants USAC the right and authority to withhold Installment Payments immediately upon the Effective Date and will deduct

⁶⁵ 47 U.S.C. § 208.

⁶⁶ See Appx. A. The Repayment Amount is based on the funding requests associated with one or more RHC Program rule violations disclosed by TeleQuality.

- each Installment Payment prior to disbursing the balance of the funds to TeleQuality.
- iii. Full repayment of \$19,047,112 shall be made by TeleQuality to the USF prior to the Termination Date.
 - iv. TeleQuality acknowledges and agrees that upon execution of this Consent Decree, the Repayment Amount, each Installment Payment, and the Minimum Annual Payment shall become a “Claim” or “Debt” as defined in 31 U.S.C. § 3701(b)(1).⁶⁷ Upon an Event of Default (as defined below), all procedures for collection as permitted by law may, at the Commission’s discretion, be initiated.
 - v. TeleQuality releases any and all claims it has asserted, could have asserted, or may assert in the future before or against USAC and/or the Commission relating to the funding requests identified in Appendix A.
- (b) TeleQuality hereby agrees to pay no less than \$2,000,000 in outstanding USF Contributions for Funding Year 2017 with respect to such funding requests listed in Appendix C through its Funding Year 2017 disbursements, and an additional amount no less than \$2,000,000 in outstanding USF contributions for Funding Year 2018 through its Funding Year 2018 disbursements with respect to such funding requests listed in Appendix C (Contributions Amount). The total Contributions Amount shall satisfy TeleQuality’s owed USF Contributions through Funding Year 2018⁶⁸ and shall be deemed to be part of the Settlement Amount.
- i. TeleQuality will repay the Contributions Amount to the USF through offsets to each such funding request approved by USAC for Funding Year 2017 and Funding Year 2018 based on the contribution factor applicable to each funding request.
 - ii. In the event that TeleQuality’s aggregate assessed Contributions for Funding Year 2017 and Funding Year 2018 total less than \$4,000,000, TeleQuality hereby agrees to pay the difference between \$4,000,000 and the aggregate assessed Contributions to the USF within thirty days of the final approved disbursement.
- (c) TeleQuality hereby waives and withdraws all pending claims before USAC and/or the Commission involving \$4,452,888 in funding requests associated with violations of the Commission’s rules governing competitive bidding in the RHC Program, as listed in Appendix B of this Consent Decree. TeleQuality further releases any and all claims it has asserted, could have asserted, or may assert in the future before or against USAC and/or the Commission relating to these funding requests. The \$4,452,888 shall be deemed to be part of the Settlement Amount.

⁶⁷ Debt Collection Improvement Act of 1996, Pub. L. No. 104-134, 110 Stat. 1321, 1358 (Apr. 26, 1996).

⁶⁸ This amount does not include any outstanding TRS, NANPA, LNPA, and Telecommunications Service Provider regulatory fees, or fees which may be assessed as a result of TeleQuality’s forthcoming revisions to its 2016, 2017, 2018, and 2019 Form 499-As. To the extent that such fees are not yet due, nothing in this Consent Decree or in the WCB December 23, 2019 Letter requires prepayment of those fees in order for commitments or disbursements to occur.

- (d) TeleQuality hereby admits that it overstated its rural rates in Funding Years 2017 and 2018 by an estimated \$3,500,000. Without prejudice to the position of the Commission, USAC, or TeleQuality as to whether TeleQuality overstated its rural rate for those years by more than \$3,500,000, TeleQuality hereby waives and withdraws up to \$3,500,000 in claims for Funding Years 2017 and 2018 before USAC and/or the Commission⁶⁹ associated with rural rate reductions for its overstated rural rates in the funding requests listed in Appendix C of this Consent Decree, in amounts determined by the Wireline Competition Bureau's December 23, 2019 Letter and any similar action resolving consideration of TeleQuality's interstate Method 3 rates for Funding Year 2018. TeleQuality further releases any and all claims and rights to appeal it has asserted, could have asserted, or may assert in the future before or against USAC and/or the Commission relating to these Method 3 rural rate determinations, up to \$3,500,000. The \$3,500,000 shall be included as part of the Settlement Amount.

26. **Event of Default.** TeleQuality agrees that an Event of Default shall occur upon the failure by TeleQuality to comply with any terms of paragraph 25 of this Consent Decree.

27. **Interest, Charges for Collection, and Acceleration of Maturity Date.** After an Event of Default has occurred under this Consent Decree, the then unpaid Repayment Amount shall accrue interest, computed using the U.S. Prime Rate in effect on the date of the Event of Default plus 4.75 percent, from the date of the Event of Default until payment in full. Upon an Event of Default, the then unpaid Repayment Amount, together with interest, any penalties permitted and/or required by the law, including but not limited to 31 U.S.C. § 3717 and administrative charges, plus the costs of collection, litigation, and attorneys' fees, shall become immediately due and payable, without notice, presentment, demand, protest, or notice of protest of any kind, all of which are waived by TeleQuality.

28. **Waivers.** As of the Effective Date, TeleQuality waives any and all rights it may have to seek administrative or judicial reconsideration, review, appeal or stay, or to otherwise challenge or contest the validity of this Consent Decree and the Adopting Order. TeleQuality shall retain the right to challenge Commission interpretation of the Consent Decree or any terms contained herein. If either Party (or the United States on behalf of the Commission) brings a judicial action to enforce the terms of the Consent Decree or the Adopting Order, neither TeleQuality nor the Commission shall contest the validity of the Consent Decree or the Adopting Order, and TeleQuality shall waive any statutory right to a trial *de novo*. TeleQuality hereby agrees to waive any claims it may otherwise have under the Equal Access to Justice Act⁷⁰ relating to the matters addressed in this Consent Decree.

29. **Severability.** The Parties agree that if any of the provisions of the Consent Decree shall be held unenforceable by any court of competent jurisdiction, such unenforceability shall not render unenforceable the entire Consent Decree, but rather the entire Consent Decree shall be construed as if not containing the particular unenforceable provision or provisions, and the rights and obligations of the Parties shall be construed and enforced accordingly.

30. **Invalidity.** In the event that this Consent Decree in its entirety is rendered invalid by any court of competent jurisdiction, it shall become null and void and may not be used in any manner in any legal proceeding.

31. **Subsequent Rule or Order.** The Parties agree that if any provision of the Consent Decree conflicts with any subsequent Rule or Order adopted by the Commission (except an Order

⁶⁹ The Wireline Competition Bureau's and USAC's review remains ongoing related to TeleQuality's rural rates for Funding Year 2017 and Funding Year 2018. See Appx. C. This Consent Decree does not limit or terminate the Wireline Competition Bureau's or USAC's review.

⁷⁰ See 5 U.S.C. § 504; 47 CFR §§ 1.1501–1.1530 (2018).

specifically intended to revise the terms of this Consent Decree to which TeleQuality does not expressly consent) that provision will be superseded by such Rule or Order.

32. **Successors and Assigns.** TeleQuality agrees that the provisions of this Consent Decree shall be binding on its successors, assigns, and transferees.

33. **Final Settlement.** The Parties agree and acknowledge that this Consent Decree shall constitute a final settlement between the Parties with respect to the Investigation. In furtherance of settlement, and subject to the other terms of this Consent Decree, the Parties agree as follows:

- (a) This Consent Decree does not settle any other investigations that have been or might be conducted by other law enforcement agencies, offices, or USAC.
- (b) TeleQuality will repay \$19,047,112 to the USF through offset of its authorized disbursements from the USF.
- (c) TeleQuality will pay \$4,000,000⁷¹ in outstanding USF Contributions for 2017 and 2018 through its Funding Years 2017 and 2018 disbursements.
- (d) TeleQuality will withdraw its claims presently before USAC, and not pursue any monies from the USF involving \$4,452,888 in USF support payments related to TeleQuality's participation in the RHC Program in connection with the funding requests listed in the attached Appendix B.
- (e) Without prejudice to the position of the Commission, USAC, or TeleQuality as to whether TeleQuality overstated its rural rate for those years by an estimated \$3,500,000, TeleQuality will withdraw up to \$3,500,000 in claims for Funding Years 2017 and 2018 before USAC and/or the Commission associated with rural rate reductions for its overstated rural rates in the funding requests listed in Appendix C of this Consent Decree, in amounts determined by the Wireline Competition Bureau's December 23, 2019 Letter and any similar action resolving its consideration of TeleQuality's interstate Method 3 rates for Funding Year 2018. TeleQuality further releases any and all claims it has asserted, could have asserted, or may assert in the future before or against USAC and/or the Commission for up to \$3,500,000 relating to these funding requests.

34. **Modifications.** This Consent Decree cannot be modified without the advance written consent of both Parties.

35. **Paragraph Headings.** The headings of the paragraphs in this Consent Decree are inserted for convenience only and are not intended to affect the meaning or interpretation of this Consent Decree.

36. **Authorized Representative.** Each Party represents and warrants to the other that it has full power and authority to enter into this Consent Decree. Each person signing this Consent Decree on behalf of a Party hereby represents that he or she is fully authorized by the Party to execute this Consent Decree and to bind the Party to its terms and conditions.

⁷¹ This amount does not include any outstanding TRS, NANPA, LNPA, and Telecommunications Service Provider regulatory fees, or fees which may be assessed as a result of TeleQuality's forthcoming revisions to its 2016, 2017, 2018, and 2019 Form 499-As.

37. **Counterparts.** This Consent Decree may be signed in counterpart (including electronically or by facsimile). Each counterpart, when executed and delivered, shall be an original, and all of the counterparts together shall constitute one and the same fully executed instrument.

Rosemary C. Harold
Chief
Enforcement Bureau

Date

Kathryn K. Ganier
General Counsel
TeleQuality Communications, LLC
District of Columbia BPR #1033357

Date

APPENDIX A

Funding Requests Associated with Repayment

15569421	15582291	15586381	15590251	15602151	15671681
15569431	15582311	15586401	15590261	15604261	15671691
15569441	15582321	15586421	15591291	15604661	15671711
15577481	15582341	15586431	15591621	15604691	15671721
15577691	15582351	15586451	15592641	15604841	15671731
15577701	15582361	15586461	15593111	15605251	15671741
15577721	15582381	15586471	15593171	15605571	15672441
15578041	15582391	15586481	15593181	15605581	15672451
15578051	15582401	15586501	15593221	15605591	15674011
15578061	15582411	15586511	15593241	15605731	15674021
15578081	15582441	15586531	15593251	15608981	15674031
15578481	15582451	15586541	15593261	15609281	15674041
15578491	15583681	15586551	15593271	15609981	15674251
15579001	15583691	15586561	15593411	15609991	15674261
15579021	15583721	15586621	15594061	15610101	15674271
15579031	15583731	15586641	15594091	15610921	15674281
15579041	15583751	15586661	15594101	15610951	15674291
15579361	15583761	15586671	15594111	15610971	15674301
15579371	15583781	15586691	15594331	15611071	15674311
15579881	15583801	15586711	15594351	15612451	15674321
15579891	15583871	15586721	15594371	15612461	15674331
15580651	15583901	15586751	15594411	15615621	15674341
15580671	15583981	15586761	15594421	15623611	15674351
15580891	15583991	15586771	15594441	15625041	15674361
15580901	15584001	15586781	15594741	15626131	15674371
15580921	15584011	15587041	15594871	15630881	15674391
15580931	15584021	15587051	15595111	15635751	15674401
15580951	15584031	15587061	15596841	15635771	15674421
15580971	15584041	15587071	15596951	15635791	15675591
15581051	15584051	15587081	15596961	15635801	15675601
15581071	15584061	15587091	15596991	15635821	15675621
15581121	15584071	15587111	15598201	15639431	15676861
15581341	15584091	15588491	15598331	15639441	15676991
15581351	15584101	15588511	15598371	15639461	15677001
15581371	15584121	15588521	15598401	15639961	15677011
15581391	15584141	15588531	15598451	15640171	15677021
15582011	15584151	15588541	15598461	15641631	15677031
15582031	15584181	15588851	15598471	15642511	15677911
15582071	15584201	15588931	15598631	15642541	15678281
15582091	15585281	15589471	15598651	15642901	15678291
15582101	15585931	15589491	15598661	15647481	15679951
15582111	15585971	15589851	15598671	15657801	15680081
15582121	15585991	15590051	15598681	15657931	15680401
15582221	15586251	15590061	15598691	15659341	15680421
15582241	15586261	15590071	15598721	15670931	15680431
15582251	15586291	15590081	15600341	15671651	15680441
15582261	15586331	15590091	15602131	15671661	15680451
15582281	15586361	15590241	15602141	15671671	15680461

15680471	15705451	15716061	15749821	15783331	16754211
15680481	15705571	15716081	15749861	15783381	16754221
15680491	15705641	15716091	15749871	15783421	16754241
15680501	15705761	15717271	15749891	15783471	16754251
15681321	15706091	15719481	15749921	15783551	16754261
15682821	15706111	15719581	15750021	15793131	16754271
15686141	15706621	15720221	15750031	15793171	16754281
15686221	15706671	15720841	15751151	15793211	16754291
15689791	15706681	15721311	15751291	15796191	16754311
15689801	15706701	15721741	15751361	15797751	16754321
15690371	15706721	15726041	15751871	15797851	16754331
15690401	15707291	15727141	15752261	15798721	16754341
15690471	15707301	15727151	15752401	15798761	16754361
15690491	15707311	15727161	15752601	15798811	16754391
15690511	15707321	15727171	15757281	15805361	16754571
15690521	15707521	15728111	15758561	15805441	16754631
15690531	15707551	15728491	15759661	15807411	16754641
15690561	15707571	15728821	15766481	15807421	16754651
15690571	15707581	15728831	15769481	15808051	16754661
15690591	15707601	15728841	15769711	15811661	16754671
15690601	15707611	15729701	15769921	15811681	16754681
15690611	15707631	15729711	15771461	15811691	16754691
15690621	15707641	15729721	15771471	15811731	16754781
15690631	15707651	15729751	15771491	15812131	16754811
15690831	15707761	15729921	15771511	15812231	16754831
15692251	15707781	15729991	15771521	15815611	16754841
15692341	15707961	15730041	15773331	15819941	16754911
15692661	15708831	15730071	15773341	15819981	16754921
15693861	15709081	15730081	15773671	15820241	16754961
15695021	15709091	15730151	15774431	15820251	16754991
15695051	15709111	15730631	15776181	15820261	16755011
15695081	15709141	15742811	15777821	15821651	16755031
15695741	15709151	15742871	15777881	15823921	16755211
15695781	15710551	15742881	15778991	15823951	16755231
15695791	15713531	15742921	15779371	15823981	16755251
15696831	15713541	15742961	15779411	15824001	16755881
15701681	15714951	15742971	15779441	15824391	16755911
15701731	15714952	15744761	15779451	15824401	16755931
15701771	15715221	15745241	15779751	15833111	16755971
15701821	15715231	15745421	15780441	15837951	16755991
15701841	15715241	15745551	15780471	16754041	16756471
15701871	15715242	15745601	15780491	16754051	16756491
15701891	15715251	15745681	15780511	16754081	16756561
15702031	15715261	15745731	15780521	16754091	16757001
15703401	15715971	15745791	15780531	16754101	16757241
15703411	15715981	15745871	15781831	16754111	16757251
15703491	15715991	15745901	15781851	16754121	16757421
15703521	15716001	15745921	15781861	16754131	16757471
15703531	15716021	15745931	15781911	16754141	16757491
15704711	15716031	15745941	15783241	16754151	16757501
15705181	15716041	15745951	15783251	16754161	16757511
15705341	15716051	15745961	15783271	16754171	16757681

16757691	16760481	16763531	16771901	16783891	16828511
16758241	16760491	16763541	16771911	16783911	16832001
16758301	16760501	16763571	16771921	16786941	16832011
16758341	16760511	16764111	16771931	16787751	16838171
16758411	16760521	16764151	16771951	16787801	16839681
16758431	16760531	16764271	16771961	16791491	16846001
16758451	16760541	16764281	16771981	16791501	16846421
16758471	16760561	16764291	16771991	16791511	16856021
16758531	16760571	16764301	16772001	16793381	16857241
16758551	16760581	16764511	16772011	16793711	16857242
16758811	16760591	16764681	16772021	16793771	16857281
16758821	16760661	16764691	16772041	16793791	16857291
16758831	16760671	16764701	16772051	16793821	16857311
16758851	16760771	16764721	16772191	16793841	16857321
16758871	16760851	16764751	16772271	16793861	16857322
16758891	16760951	16765241	16772301	16793881	16857341
16758911	16760961	16765261	16772311	16793901	16858061
16758931	16761001	16765381	16772321	16794191	16858991
16758971	16761031	16765421	16772341	16794241	16859661
16759091	16761081	16765451	16774521	16796391	16859711
16759321	16761101	16765501	16777611	16796401	16859761
16759331	16761331	16765671	16777661	16796431	16859791
16759341	16761361	16765681	16777701	16796471	16860031
16759361	16761371	16766621	16777731	16796501	16860091
16759371	16761381	16766631	16777771	16796511	16860131
16759381	16761391	16766651	16777801	16796521	16860141
16759391	16761911	16766671	16779621	16798901	16860251
16759411	16762091	16766691	16779811	16798911	16860301
16759551	16762111	16767021	16779861	16798931	16860351
16759581	16762121	16767071	16779891	16799751	16860361
16759601	16762141	16767621	16779901	16799761	16860381
16759651	16762151	16767651	16779921	16799821	16860401
16760251	16762161	16767951	16780541	16799931	16860411
16760271	16762181	16768021	16780551	16800031	16860531
16760281	16762201	16768051	16780561	16800091	16860551
16760291	16762211	16768151	16781931	16800101	16860571
16760301	16762231	16768181	16781941	16800111	16860591
16760311	16762241	16768231	16782061	16800121	16860601
16760321	16762281	16768261	16783321	16800431	16860621
16760331	16762291	16768271	16783351	16809931	16861001
16760351	16762301	16768281	16783361	16809951	16861041
16760361	16762321	16769261	16783371	16809961	16861081
16760371	16762331	16769291	16783781	16809981	16861091
16760381	16762971	16769611	16783791	16815061	16861101
16760401	16762991	16769861	16783801	16815481	16862921
16760411	16763011	16771831	16783821	16815501	16862931
16760421	16763031	16771841	16783831	16815531	16862961
16760431	16763051	16771851	16783841	16815551	16862971
16760441	16763071	16771861	16783851	16815561	16862981
16760451	16763451	16771871	16783861	16816321	16863021
16760461	16763481	16771881	16783871	16816361	16863031
16760471	16763511	16771891	16783881	16826741	16863051

16863071	16867561	16869841	16879321	16884581	16934371
16863101	16867591	16869851	16879371	16884641	16934411
16863121	16867641	16869861	16880531	16887461	16934501
16863151	16867651	16869871	16880551	16887471	16934521
16863171	16867661	16869881	16880561	16887481	16934561
16863181	16867671	16869891	16880611	16887491	16936061
16863191	16867691	16870091	16880671	16887501	16936091
16863201	16867701	16870151	16880781	16887511	16936161
16863221	16867721	16870171	16880801	16887521	16937421
16863241	16867731	16870181	16880821	16887531	16937441
16863581	16867751	16870481	16880841	16887541	16937471
16863591	16867761	16871371	16880871	16887561	16941431
16863611	16867781	16871381	16880891	16888271	16941571
16863741	16867791	16871541	16880921	16888301	16941661
16863761	16867811	16871551	16880981	16889121	16941691
16863821	16867951	16872111	16881001	16889181	16941741
16863861	16867971	16872121	16881011	16891461	16941751
16863881	16867981	16872131	16881021	16891471	16941761
16863911	16867991	16872221	16881071	16891491	16941771
16863931	16868011	16872911	16881091	16891521	16941791
16863971	16868041	16872921	16881121	16891541	16941811
16864001	16868051	16872961	16881141	16920521	16941851
16864031	16868061	16873221	16881151	16920551	16941871
16865571	16868081	16873361	16881171	16920581	16941881
16865581	16868091	16873421	16881191	16920601	16941921
16865591	16868101	16873441	16881211	16920661	16941941
16865601	16868111	16873451	16881251	16920721	16941991
16865621	16868121	16873461	16881421	16920751	16942021
16865631	16868271	16873471	16881521	16920841	16942051
16865651	16869201	16873571	16881541	16920891	16942081
16865841	16869471	16873581	16881551	16921011	16943351
16865851	16869481	16873591	16881561	16921071	16947161
16866111	16869501	16873601	16881571	16921091	16948011
16866121	16869511	16873611	16881591	16921351	16948881
16866141	16869561	16873621	16881601	16921371	16951011
16866171	16869571	16873631	16882061	16921381	16951071
16866191	16869581	16873641	16882091	16921391	16951161
16866751	16869591	16873651	16882181	16921421	16951221
16867211	16869601	16873771	16882541	16926891	16952411
16867221	16869611	16873781	16882961	16926991	16952631
16867281	16869621	16873791	16883621	16927081	16953451
16867291	16869631	16873801	16883701	16927351	16953461
16867301	16869641	16873811	16883711	16927391	16953471
16867311	16869651	16874681	16883721	16933221	16953481
16867341	16869661	16874691	16883751	16933231	16953521
16867351	16869671	16874701	16883781	16934081	16953531
16867371	16869701	16875751	16883811	16934101	16953541
16867391	16869711	16875781	16883821	16934161	16953551
16867401	16869721	16876881	16883841	16934221	16953561
16867411	16869731	16879101	16884301	16934241	16953581
16867461	16869741	16879221	16884341	16934251	16953631
16867521	16869751	16879261	16884451	16934321	16953651

16953661	17106931	17121631	17175781	17207411	17243931
16953751	17106961	17121661	17175851	17207481	17244051
16953791	17106971	17121681	17176051	17207501	17244061
16953891	17106991	17122791	17179111	17207591	17245171
16953921	17107011	17123891	17179461	17207611	17245581
16953981	17107021	17124111	17179481	17207641	17245691
16954041	17107191	17144841	17179491	17207741	17245821
16954071	17108621	17144881	17179501	17207771	17245891
16954501	17108661	17145771	17184861	17207811	17253111
16954551	17108691	17147951	17184911	17207821	17253171
16954561	17111661	17147981	17184981	17210701	17253211
16954641	17113291	17150661	17185031	17212481	17253351
16955421	17113411	17152791	17185061	17213241	17253381
16955441	17113431	17162041	17185091	17213281	17253401
16955501	17113471	17167061	17185111	17213321	17253451
16955541	17114691	17167561	17187571	17213371	17253491
16956431	17115221	17167631	17187621	17213471	17253511
16956621	17115341	17167661	17188211	17214391	17253541
16957701	17115411	17167931	17192491	17214441	17253871
16957731	17115641	17168021	17192651	17214471	17253961
16957771	17115821	17169001	17192671	17214481	17254021
16958981	17116551	17169631	17193921	17214501	17254061
16958991	17116591	17170561	17193961	17214511	17254331
16959671	17116731	17170831	17194041	17214521	17254351
16959851	17116841	17170841	17194071	17214541	17254491
16960611	17116901	17170851	17194081	17214561	17254621
16962231	17116931	17170871	17194101	17214671	17254721
16962261	17117451	17170911	17194121	17215561	17254831
16962281	17117491	17170941	17194131	17220571	17255351
16962311	17117501	17170961	17194141	17220611	17255361
16962421	17117541	17170971	17194161	17223791	17255371
16962521	17117901	17170981	17194181	17223831	17255381
16962851	17118011	17171011	17194191	17223911	17255391
16962891	17118061	17171031	17195161	17223931	17255401
16962911	17118071	17171141	17195251	17224041	17255421
16966301	17118081	17171231	17195411	17226721	17255441
16976881	17118091	17171331	17195441	17227611	17255661
16978341	17118101	17171361	17195461	17227671	17255681
16984641	17118681	17171381	17195481	17227851	17255831
17102671	17118711	17171411	17195511	17227981	17256841
17102681	17118741	17171441	17195561	17228141	17256861
17102721	17118751	17171831	17195581	17229611	17256871
17102731	17119031	17171871	17197601	17231501	17256891
17105491	17119321	17171911	17197991	17231901	17256901
17105511	17119331	17171931	17204831	17232521	17256921
17105541	17119341	17171941	17204851	17232541	17256961
17106831	17120031	17171951	17204871	17232571	17256971
17106841	17120231	17171971	17206491	17232581	17256981
17106851	17120261	17171991	17206601	17232611	17256991
17106871	17120291	17172001	17206611	17232631	17257001
17106891	17120321	17172021	17207311	17243871	17257011
17106901	17121591	17173501	17207371	17243901	17257021

17257301	17260861	17261221	17271491	17277261	17279921
17257471	17260871	17261231	17271601	17277611	17279991
17258661	17260881	17261241	17271691	17277901	17280161
17258721	17261121	17261251	17272441	17278411	17280361
17258751	17261181	17265311	17273711	17279141	17280451
17259051	17261191	17265391	17276741	17279341	
17259121	17261211	17265671	17277221	17279521	

APPENDIX B

Funding Requests Withdrawn for Competitive Bidding Violations

1710683	1719413	1835325	1845537
1710684	1719414	1835326	1845538
1710685	1719416	1835329	1845790
1710687	1719418	1835330	1845813
1710689	1719419	1835460	1845822
1710690	1720143	1835468	1845827
1710693	1720155	1835478	1845832
1710696	1720161	1835733	1845839
1710697	1721556	1835735	1845842
1710699	1721915	1835737	1845853
1710701	1722100	1835739	1845876
1710719	1722744	1835741	1845883
1711329	1722754	1835744	1845889
1711341	1722761	1835748	1845898
1711343	1722767	1835749	1845910
1711347	1722773	1835751	1845920
1711351	1722788	1835753	1845926
1714481	1722815	1838826	1846125
1716716	1722816	1844606	1846128
1716963	1725387	1844626	1846130
1717114	1725396	1844631	1846131
1717123	1725415	1844917	1846134
1717133	1725421	1844930	1846139
1717138	1725430	1844934	1846141
1717819	1830300	1844938	1846145
1718486	1831696	1844944	1846147
1718501	1835306	1844947	1846150
1719392	1835308	1844965	1846152
1719396	1835314	1844979	1846479
1719407	1835317	1845416	1846490
1719408	1835321	1845425	1846510
1719410	1835322	1845429	1846519
1719412	1835324	1845534	1846522

APPENDIX C

Rural Rates Reviewed/Under Review by WCB for Funding Year 2017 and Funding Year 2018

1710267	1711673	1716706	1718506	1721104	1723839
1710268	1711676	1716716	1718509	1721108	1724387
1710272	1711679	1716756	1718511	1721226	1724390
1710273	1711681	1716793	1718730	1721238	1724393
1710442	1711682	1716798	1718757	1721248	1724405
1710461	1711684	1716802	1718762	1721253	1724464
1710474	1711690	1716900	1719249	1721439	1724491
1710549	1711693	1716910	1719254	1721444	1724496
1710551	1711776	1716963	1719256	1721452	1724513
1710554	1711779	1716976	1719257	1721454	1724517
1710862	1711783	1716979	1719260	1721456	1724532
1710866	1711787	1717083	1719261	1721458	1724582
1711077	1711789	1717103	1719262	1721467	1724584
1711080	1711790	1717114	1719264	1721471	1724589
1711082	1711792	1717123	1719265	1721479	1724591
1711086	1711806	1717133	1719266	1721481	1724594
1711087	1711808	1717136	1719267	1722100	1724596
1711088	1711866	1717138	1719271	1722104	1724794
1711089	1711868	1717141	1719275	1722127	1724951
1711166	1711875	1717144	1719282	1722404	1725204
1711273	1711877	1717146	1719419	1722612	1725308
1711300	1711903	1717171	1719534	1722655	1725311
1711302	1711928	1717183	1719603	1722672	1725315
1711462	1711930	1717187	1719760	1722719	1725318
1711469	1712047	1717191	1719774	1722744	1725320
1711488	1712072	1717197	1720389	1722754	1725335
1711512	1712389	1717199	1720483	1722761	1725338
1711522	1712391	1717200	1720485	1722767	1725340
1711527	1712392	1717202	1720487	1722773	1725345
1711534	1712407	1717346	1720488	1722785	1725362
1711541	1712411	1717350	1720649	1722788	1725385
1711564	1712417	1717353	1720660	1722797	1725387
1711582	1712418	1717355	1720661	1722798	1725389
1711636	1714565	1717357	1720731	1722961	1725396
1711639	1714574	1717578	1720737	1723149	1725402
1711640	1714577	1717582	1720741	1723150	1725406
1711641	1714583	1717585	1720744	1723190	1725415
1711643	1714588	1717944	1720747	1723246	1725421
1711644	1714795	1717946	1720748	1723247	1725433
1711646	1714798	1717948	1720750	1723250	1725435
1711648	1715066	1717949	1720759	1723252	1725449
1711649	1715279	1717950	1720777	1723254	1725462
1711652	1715806	1717951	1720781	1723257	1725472
1711660	1715808	1718486	1720782	1723258	1725483
1711661	1715809	1718491	1721017	1723261	1725535
1711663	1715811	1718498	1721027	1723263	1725536
1711667	1715860	1718501	1721039	1723831	1725537
1711668	1716656	1718503	1721079	1723834	1725538

1725539	1727483	1833821	1835945	1844690	1845539
1725540	1727722	1833822	1835946	1844693	1845548
1725542	1727896	1833823	1835952	1844699	1845559
1725544	1727914	1833824	1835988	1844702	1845600
1725558	1727934	1834775	1835994	1844703	1845615
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1725561	1727967	1834902	1835999	1844711	1845629
1725562	1727968	1834904	1836145	1844713	1845639
1725565	1727982	1834912	1837884	1844718	1845665
1725572	1727992	1834913	1838461	1844721	1845666
1725644	1727999	1834981	1838462	1844723	1845695
1725682	1728011	1835079	1838464	1844734	1845698
1725684	1728016	1835084	1838466	1844736	1845701
1725686	1728027	1835087	1838468	1844750	1845704
1725687	1728036	1835104	1838470	1844767	1845710
1725689	1728045	1835132	1838574	1844822	1845715
1725690	1728054	1835134	1838605	1844824	1845729
1725692	1728097	1835137	1838608	1844826	1845732
1725696	1728107	1835281	1838609	1844828	1845760
1725697	1728119	1835291	1838833	1844829	1845768
1725698	1728127	1835293	1838834	1844830	1845770
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1725735	1830323	1835362	1839129	1844952	1845808
1725742	1830433	1835460	1839131	1844957	1845815
1725745	1830435	1835502	1839132	1844961	1845845
1725749	1830562	1835508	1839134	1844965	1845846
1725753	1830576	1835565	1839135	1844966	1845847
1725872	1830682	1835733	1839140	1844974	1845854
1725875	1830688	1835735	1839143	1844979	1845856
1726086	1830695	1835737	1839144	1844986	1845862
1726087	1831474	1835739	1839145	1844987	1845868
1726088	1831495	1835741	1839348	1844988	1845870
1726112	1831499	1835744	1840772	1844990	1845875
1726114	1831734	1835748	1842956	1844993	1845881
1726118	1831998	1835749	1842988	1844998	1845884
1726119	1833558	1835751	1843137	1845000	1845888
1726120	1833566	1835753	1844005	1845003	1845893
1726121	1833572	1835754	1844006	1845162	1845902
1726122	1833577	1835761	1844007	1845284	1845905
1726123	1833582	1835765	1844009	1845343	1845918
1726124	1833738	1835768	1844014	1845356	1845931
1726125	1833786	1835797	1844026	1845364	1845935
1726363	1833810	1835824	1844488	1845372	1845937
1726539	1833815	1835825	1844606	1845451	1845941
1726567	1833816	1835870	1844650	1845485	1845946
1726923	1833817	1835884	1844663	1845534	1845948
1727244	1833819	1835891	1844668	1845537	1845958
1727393	1833820	1835940	1844681	1845538	1845960

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1846180	1847010
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APPENDIX D

**Funding Requests Included in Enforcement Bureau Investigation for Funding Year 2015 through
Funding Year 2018**

15569421	15581351	15584041	15587041	15591291	15598651
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15572111	15581871	15584071	15587071	15593111	15598681
15574951	15581881	15584091	15587081	15593171	15598691
15577171	15581891	15584101	15587091	15593181	15598721
15577481	15582011	15584121	15587111	15593221	15600341
15577691	15582031	15584141	15587661	15593241	15602131
15577701	15582071	15584151	15587671	15593251	15602141
15577711	15582091	15584181	15587681	15593261	15602151
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15578041	15582121	15585931	15587751	15594061	15604691
15578051	15582221	15585971	15587771	15594091	15604841
15578061	15582241	15585991	15587781	15594101	15605251
15578081	15582251	15586251	15587821	15594111	15605571
15578101	15582261	15586261	15587851	15594331	15605581
15578481	15582281	15586291	15587871	15594351	15605591
15578491	15582291	15586331	15587921	15594361	15605731
15579001	15582311	15586361	15587941	15594371	15608981
15579021	15582321	15586381	15587961	15594411	15609281
15579031	15582341	15586401	15587991	15594421	15609971
15579041	15582351	15586421	15588061	15594441	15609981
15579321	15582361	15586431	15588171	15594631	15609991
15579341	15582381	15586451	15588491	15594651	15610101
15579351	15582391	15586461	15588511	15594741	15610921
15579361	15582401	15586471	15588521	15594821	15610951
15579371	15582411	15586481	15588531	15594861	15610971
15579381	15582441	15586491	15588541	15594871	15611071
15579401	15582451	15586501	15588851	15594911	15612451
15579411	15583681	15586511	15588931	15595111	15612461
15579881	15583691	15586531	15589471	15596841	15613761
15579891	15583721	15586541	15589491	15596951	15615621
15580511	15583731	15586551	15589771	15596961	15623611
15580651	15583751	15586561	15589791	15596991	15623621
15580671	15583761	15586621	15589821	15597171	15625041
15580891	15583781	15586641	15589831	15598201	15626131
15580901	15583801	15586661	15589851	15598331	15630881
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15581051	15584001	15586751	15590091	15598451	15635821
15581071	15584011	15586761	15590241	15598461	15637131
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15674351	15692341	15695231	15697281	15700151	15708831
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15674371	15693021	15695261	15697311	15700311	15709091
15674391	15693051	15695281	15697431	15700321	15709111
15674401	15693071	15695291	15697451	15700331	15709141
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15715221	15735701	15771511	15807021	15813411	16754341
15715222	15735711	15771521	15807041	15813441	16754361
15715231	15735721	15773331	15807411	15813451	16754391
15715232	15735731	15773341	15807421	15813961	16754571
15715241	15742811	15773671	15808051	15814081	16754631
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15715251	15742881	15775211	15809431	15817711	16754651
15715252	15742921	15776181	15811081	15819521	16754661
15715261	15742961	15777821	15811091	15819941	16754671
15715262	15742971	15777881	15811101	15819981	16754681
15715971	15744661	15778991	15811131	15820241	16754691
15715981	15744761	15779371	15811151	15820251	16754781
15715991	15745241	15779411	15811171	15820261	16754811
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15716061	15745791	15780491	15811271	15824391	16754991
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15716091	15745901	15780521	15811291	15824421	16755031
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15727141	15749891	15783251	15811591	16754041	16755971
15727151	15749921	15783271	15811621	16754051	16755991
15727161	15750021	15783331	15811661	16754081	16756471
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16758451	16760541	16763571	16771841	16783821	16815501
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16758531	16760571	16764151	16771861	16783841	16815551
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16758931	16761001	16764701	16771961	16787801	16839681
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16759371	16761381	16765381	16772051	16793791	16857282
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16759391	16761451	16765421	16772271	16793841	16857292
16759411	16761481	16765431	16772301	16793861	16857311
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16861031	16865451	16867161	16867981	16869641	16873791
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