HURLBERT CPA
regulatory audit services

Glenwood Telephone Company

Agreed-Upon Procedures Applied to the Universal Access Fund Application for the period ending 6/30/2024

May 5, 2025

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Independent Accountant's Report on Applying Agreed-Upon Procedures

GLENWOOD TELEPHONE COMPANY

To the Georgia Public Service Commission:

We have performed the procedures enumerated below on the application for funding from the Georgia Universal Access Fund provided to us by management of Glenwood Telephone Company (or the "Company"). The responsible party Glenwood Telephone Company is responsible for the application.

The engaging party, Georgia Public Service Commission ("GPSC") has agreed to and acknowledged that the procedures performed are appropriate to meet the intended purpose of assessing the application's reasonableness prior to funds being distributed to Glenwood Telephone Company as of June 30, 2024. This report may not be suitable for any other purpose. The procedures performed may not address all the items of interest to a user of this report and may not meet the needs of all users of this report and, as such, users are responsible for determining whether the procedures performed are appropriate for their purposes.

The procedures are listed below with associated findings listed on the following pages.

AUP	Agreed-Upon Procedure
1	Obtain UAF company pre-filed information and schedules filed with the GPSC
2	Issue specific Contractor data requests to the UAF Companies and schedule field work
3	Audit the company's UAF model (printed version as well as spreadsheet testing)
4	Trace amounts on the Applicant's Form M back to Company prepared schedules matching their General Ledger
5	Trace Form M data to the UAF Model column entitled Balance Per Books
6	Trace amounts in the "subject to separations" adjustment column of the UAF Model to Net Operating Income (NOI) and Rate of Return (ROR) on rate base calculations
7	Trace amounts in the "non-regulated" adjustment column of UAF Model to supporting journal entries of cost study. Selected supporting work papers are reviewed for reasonableness, accuracy, and conformance.
8	Test the FCC Part 36 study and review allocation/traffic factors
9	Test and recalculate the Revenue Requirement Section on the UAF Model
10	Review each invoice over $250 and select those invoices that appear unreasonable
11	Review corporate allocations and the Company's Cost Allocation Manual

12 Verify fixed asset amounts in the company's Continuing Property Record and identify those assets that are inappropriately included in rate base in the UAF application. If applicant is a recipient of Federal or state Broadband Grants, determine whether the grants were to be used as revenue, expense offsets, or for capital acquisitions. To the extent such grants are/were used for capital acquisition, review books to ensure that such purchased assets are excluded from the rate base for UAF purposes

13 Verify the amounts of Federal universal service fund support reported in the UAF Application. Review UAF Applicant work

14 Verify that any long-term debt interest costs treated as AFUDC (Allowance for Funds Used During Construction) were treated either as current year income or as a reduction to interest rates

15 Verify that any Patronage Dividends credited (not necessarily received in cash) from long term lenders are treated as a reduction to the cost of debt

16 Review the outside auditor's report on the financial statements and report any adverse findings or qualified opinions

17 Review and test the requested amount for Executive Compensation and Corporate Operations Expense and compared the amount shown in the UAF application to the GPSC caps

18 Review depreciation rates used for the UAF application and compare to the rates adopted by the GPSC

19 Review cost allocation manual, verify that it is being used, test a sample of allocations and report when the manual was last updated

20 Incorporate revised factors or methods adopted by GPSC, such as cost of equity, into the UAF model

21 Prepare exhibits of financial results and support mechanisms. Analyze as to why increases/decreases occurred

22 Identify Construction Work in Progress and Retirement amounts for the test year

23 Identify the company's affiliates and non-regulated services

24 Identify the total costs charged to the regulated company by the affiliate or parent company. Quantified costs by FCC USOA Account and determined the per access line amount over the past 3 years. If the costs appear unreasonable, propose adjustments or informed GPSC staff and recommend an affiliated transactions engagement be performed

25 For ACAM UAF companies only, obtain the company spreadsheet depicting calculated amounts, review company prepared adjustments, trace adjustments in the UAF application model to the spreadsheet and identify impact of the adjustment

26 Test and review the Approved Cost of Equity and Cost of Capital Rates of Tier II local exchange carriers for the purpose of evaluating applications for reimbursement from the UAF. The rate of return on rate base will be limited to the lesser of 8.0% or the level computed based on a 9.25% return on equity, using the applicant's actual cost of debt and the applicant's actual debt/equity structure. Verify that the above calculation was used in the respective UAF Model

27 Finalize work papers and prepare final report

28 Prepare testimony if requested.

We were engaged by the GPSC to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to and did not conduct and examination or review engagement, the objective of which would be the expression of an opinion or conclusion, respectively, on the application. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of Glenwood Telephone Company and to meet our other ethical responsibilities, in accordance with relevant ethical requirements related to our agreed-upon procedures engagement. This report is intended solely for the information and use of the Georgia Public Service Commission and Glenwood Telephone Company and is not intended to be, and should not be, used by anyone other than these specified parties.

Vic Hurlbert, CPA
Hurlbert CPA LLC
Liberty, Missouri
May 5, 2025

Current Request for UAF Disbursements – Summary of Findings

Glenwood Telephone Company's final revenue deficiency is $593,762.

Table 1
Glenwood Telephone Company

Georgia UAF Summary	Amounts
Original Company Requested Amount from Georgia Universal Access Fund	$595,271
Adjustment – Procedure 10	-$1,509
Final Amount Recommended by Staff	$593,762

As presented in Table 1, we propose Glenwood Telephone Company receive a UAF disbursement of $593,762 annual disbursement based upon the test year for the twelve months ending June 30, 2024.

Profile of Glenwood Telephone Company

Glenwood Telephone Company provides local telephone service to individuals and businesses within the boundaries of its local service area. The Company has 240 access lines. An organizational chart of the Company is provided in Exhibit No. 1. The Development of the Test Year Rate Base and Net Operating Income as submitted by the Company in support of its request is provided in Exhibit No. 2. The Company's calculation of the claimed revenue deficiency is presented in Exhibit No. 3.

Agreed Upon Procedures

Procedure 1: Obtained UAF company pre-filed information and schedules filed with the GPSC.

Conclusion – We reviewed pre-filed files downloaded from the GPSC web site. There were no discrepancies noted.

Procedure 2: Issued specific Contractor data requests to the UAF Companies and scheduled field work

Conclusion – Data requests were sent to the UAF companies and the Company responded to all data requests.

Procedure 3: Audited the Company's UAF model (printed version as well as spreadsheet testing).

Conclusion – There were no discrepancies noted.

Procedure 4: Traced amounts on the Applicant's Form M back to Company prepared schedules matching their General Ledger.

Conclusion – There were no discrepancies noted.

Procedure 5: Traced Form M data to the UAF Model column entitled Balance Per Books

Conclusion – There were no discrepancies noted.

Procedure 6: Traced amounts in the "subject to separations" adjustment column of the UAF Model to Net Operating Income (NOI) and Rate of Return (ROR) on rate base calculations.

Conclusion – There were no discrepancies noted.

Procedure 7: Traced amounts in the "non-regulated" adjustment column of UAF Model to supporting journal entries of cost study. Selected supporting work papers are reviewed for reasonableness, accuracy, and conformance.

Conclusion – There were no discrepancies noted.

Procedure 8 Tested the FCC Part 36 study and review allocation/traffic factors.

Conclusion – The factors appeared reasonable.

Procedure 9: Tested and recalculate the Revenue Requirement Section on the UAF Model.

Conclusion – There were no discrepancies noted.

Procedure 10: Reviewed each invoice over $250 and selected those invoices that appeared unreasonable.

Conclusion – We found invoices that were unreasonable to us including the below.

Account	Type	Description	Amount
(REDACTED)	**(REDACTED)**	**(REDACTED)**	$1,650
(REDACTED)	**(REDACTED)**	**(REDACTED)**	$1,000
Total			$2,650

Procedure 11: Reviewed corporate allocations and the Company's Cost Allocation Manual

Conclusion – The Company does not employ a cost allocation manual. The Company directly assigns costs to cost functions.

Procedure 12 Verified fixed asset amounts in the Company's Continuing Property Record and identify those assets that are inappropriately included in rate base in the UAF application. If applicant is a recipient of Federal or state Broadband Grants, determined whether the grants were to be used as revenue, expense offsets, or for capital acquisitions. To the extent such grants are/were used for capital acquisition, review books to ensure that such purchased assets are excluded from the rate base for UAF purposes.

Conclusion – There were no discrepancies noted.

Procedure 13 Verified the amounts of Federal universal service fund support reported in the UAF Application. Review UAF Applicant work.

Conclusion – There were no discrepancies noted.

Procedure 14: Verified that any long-term debt interest costs treated as AFUDC (Allowance for Funds Used During Construction) were treated either as current year income or as a reduction to interest rates.

Conclusion – Not applicable.

Procedure 15: Verified that any Patronage Dividends credited (not necessarily received in cash) from long term lenders are treated as a reduction to the cost of debt.

Conclusion – Not applicable.

Procedure 16: Reviewed the outside auditor's report on the financial statements and report any adverse findings or qualified opinions.

Conclusion – The Company's outside auditor's 2024 report provided an unqualified opinion.

Procedure 17: Reviewed and tested the requested amount for Executive Compensation and Corporate Operations Expense and compared the amount shown in the UAF application to the GPSC caps.

Conclusion – The Company complied with the GPSC approved expense cap.

Procedure 18: Reviewed depreciation rates used for the UAF application and compared to the rates adopted by the GPSC.

Conclusion – The Company's depreciation rates matched or were less than the rates prescribed by the GPSC.

Regulated Depreciation Expense was $251,544 in the UAF application. Per the UAF model, Total Plant in Service was $7,527,442. Composite depreciation rate equals depreciation per year divided by total historical cost. The composite rate is shown below.

Depreciation Expense	$251,544
Total Plant in Service	$7,527,442
Composite Rate	3.34%

Procedure 19: Reviewed cost allocation manual, verify that it is being used, test a sample of allocations and report when the manual was last updated.

Conclusion – The Company does not employ a cost allocation manual. The Company directly assigns costs to cost functions.

Procedure 20: Incorporated revised factors or methods adopted by GPSC, such as cost of equity, into the UAF model.

Conclusion - The current cost of equity approved by the GPSC is 9.25%. Using the Company's actual debt/equity ratio and actual cost of debt, the Company's weighted average cost of capital ("WACC") is 8.61150%. Because the Company's WACC did exceed the GPSC's 8% cap, the allowed return on rate base was the 8%.

Procedure 21: Prepared exhibits of financial results and support mechanisms. Analyzed as to why increases/decreases occurred.

Financial Results: 2018 – 2024

Description	2018	2019	2020	2021	2022	2023	2024
Net Telecom Plant	**$(REDACTED)**	**$(REDACTED)**	**$(REDACTED)**	**$(REDACTED)**	**$(REDACTED)**	**$(REDACTED)**	**$(REDACTED)**
Operating Revenues	**$(REDACTED)**	**$(REDACTED)**	**$(REDACTED)**	**$(REDACTED)**	**$(REDACTED)**	**$(REDACTED)**	**$(REDACTED)**
Operating Expenses	**$(REDACTED)**	**$(REDACTED)**	**$(REDACTED)**	**$(REDACTED)**	**$(REDACTED)**	**$(REDACTED)**	**$(REDACTED)**
Operating Income/(Loss)	**$(REDACTED)**	**$(REDACTED)**	**$(REDACTED)**	**$(REDACTED)**	**$(REDACTED)**	**$(REDACTED)**	**$(REDACTED)**
Total Access Lines	**$(REDACTED)**	**$(REDACTED)**	**$(REDACTED)**	**$(REDACTED)**	**$(REDACTED)**	**$(REDACTED)**	**$(REDACTED)**

Conclusion – Revenues decreased and expenses increased causing net income to decrease.

Receipt of Federal Universal Service Support 2018 – 2024

Description	2018	2019	2020	2021	2022	2023	2024
High-Cost Loop	$200,539	$245,605	$199,542	$333,920	$367,369	$302,754	$249,360
Interstate Common	$192,060	$179,784	$199,280	$333,678$	$524,596	$825,224	$739,872
Local Switching	0	0	0	0	0	0	0
Safety Net Additive	0	0	0	0	0	0	0
Safety Valve Support	0	0	0	0	0	0	0
Lifeline & Link-up	$452	$526	$250	$294	$129	$92	$40
Total	$393,051	$425,915	$399,072	$667,892	$892,094	$1,128,070	$989,272

Procedure 22: Identified Construction Work in Progress and Retirement amounts for the test year.

Conclusion – The Company had Construction Work in Progress and Plant Retirements at 6/30/2023 of $1,249,672and $0, respectively.

Procedure 23 Identified the Company's affiliates and non-regulated services.

Glenwood Telephone Company created a subsidiary during 2019 named South Georgia Broadband. This Subsidiary only had organizational activity prior to June 30, 2019. This subsidiary is used to account for Deregulated services and offerings outside of the Company's territory. Glenwood Telephone Company, Inc. was awarded $4,864,941 in Capital Project Funds to build approximately 147 miles of fiber to serve 608 locations in Wheeler County, Georgia. The funds to the extent used to build the plant inside the ILEC service area will reduce the cost of the plant installed. As of June 30, 2024, **$(REDACTED)** has been received in Grant Funds. Amounts have been used to reduce deferred engineering cost and the remainder is in Deferred Grant revenue and will be allocated to work orders as the work order is closed.

Conclusion – There were no discrepancies noted.

Procedure 24 Identified the total costs charged to the regulated company by the affiliate or parent company.

Conclusion - Not applicable, Glenwood Telephone Company has no affiliates.

Cost per Access Line

Quantified costs by FCC USOA Account and determined the per access line amount over the past 3 years. If the costs appeared unreasonable, proposed adjustments or informed GPSC staff and recommended an affiliated transactions engagement be performed.

Glenwood had the highest average cost per access line for the following accounts among all UAF companies:

1. Central Office Switching Expense
2. General & Administrative Expense.

Procedure 25 For ACAM UAF companies only, obtain the Company spreadsheet depicting calculated amounts, Reviewed Company prepared adjustments, trace adjustments in the UAF application model to the spreadsheet and identify impact of the adjustment.

Conclusion – Not applicable

Procedure 26 Tested and Reviewed the Approved Cost of Equity and Cost of Capital Rates of Tier II local exchange carriers for the purpose of evaluating applications for reimbursement from the UAF. The rate of return on rate base will be limited to the lesser of 8.0% or the level computed based on a 9.25% return on equity, using the applicant's actual cost of debt and the applicant's actual debt/equity structure. Verify that the above calculation was used in the respective UAF Model.

Conclusion – There were no discrepancies noted.

Procedure 27 Finalize work papers and prepare final report.

Procedure 28 Prepare testimony if requested.

Exhibit Nos. 1 – 3

1. Glenwood Telephone Company Organization Chart
2. Glenwood Telephone Company UAF Net Operating Income and Rate of Return on Rate Base Calculation
3. Glenwood Telephone Company UAF Cost of Capital Structure and Return on Equity Calculation

Exhibit 1

Glenwood Organization Chart

(REDACTED)

Exhibit 2

(REDACTED)

Exhibit 3

(REDACTED)