HURLBERT CPA
regulatory audit services

Waverly Hall Telephone, LLC

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

WAVERLY HALL TELEPHONE, LLC

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 Waverly Hall Telephone, LLC (or the "Company"). The responsible party Waverly Hall Telephone, LLC 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 Waverly Hall Telephone, LLC 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 Waverly Hall Telephone, LLC 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 Waverly Hall Telephone, LLC 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

Waverly Hall Telephone, LLC's final revenue deficiency is $425,825. We propose no adjustments.

Table 1
Waverly Hall Telephone, LLC

Georgia UAF Summary	Amounts
Original Company Requested Amount from Georgia Universal Access Fund	$425,825
Total Adjustments	0
Final Amount Recommended by Staff	$425,825

As presented in Table 1, we propose Waverly Hall Telephone, LLC receive a UAF disbursement of $425,825 based upon the test year for the twelve months ending June 30, 2024.

Profile of Waverly Hall Telephone, LLC

Waverly Hall Telephone, LLC serves approximately 495 access lines in Harris and Talbott Counties in Georgia. Waverly Hall Telephone was formed in 1944 by Julian Jones to provide local telephone service to people living within the city limits of Waverly Hall, GA.

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 select those invoices that appear unreasonable.

Conclusion - There were no discrepancies noted.

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. There were no Broadband Grants.

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 – There were no discrepancies noted.

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 REDACTED in the UAF application. Per the UAF model, Total Plant in Service was REDACTED. Composite depreciation rate equals depreciation per year divided by total historical cost. The composite rate is shown below.

Depreciation Expense	REDACTED
Total Plant in Service	REDACTED
Composite Rate	2.90%

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.

Waverly Hall Telephone, LLC charges direct regulated and non-regulated revenues, assets and expenses to the appropriate sub-accounts for analysis, and all direct non-regulated amounts are removed from the Interstate Cost Study, the Interstate USF filing process, and the UAF model based on a review of the nature of these accounts. In addition, all assets used for both regulated and non-regulated operations are analyzed by JSI, and a proportionate level of the assets and all related operating expenses are removed for study purposes. The adjustments made for the December 8, 2021 UAF filings are documented in the Earnings model that is included in the filing.

With regard to the proper treatment of Federal and State entries, all revenues are directly assigned to the appropriate jurisdiction based on the nature of those revenues. Federal High Cost Loop support payments received during the test period are assigned to the Intrastate jurisdiction, in accordance with the traditional ratemaking treatment accorded to these revenues. In addition, to the extent that Safety Net additive support is received by the Company, these revenues are also assigned to the Intrastate jurisdiction, as that funding mechanism is a by-product of the USF High Cost Loop program. All rate base and operating expenses are assigned to the Intrastate jurisdiction using the appropriate separations factors as developed in the most recent NECA Interstate Cost Study.

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 9.24929%. 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.

Conclusion – Net plant increased due to plant additions. Revenues and expenses increased.

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
Net operating margins	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total access lines	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Receipt of Federal Universal Service Support

Support	2018	2019	2020	2021	2022	2023	2024
HCLS	$33,773	$152,398	$118,393	$94,188	$59,694	$67,182	$147,040
ICLS CAF-BLS	206,142	304,130	263,618	197,310	367,476	805,164	1,249,608
LSS	0	0	0	0	0	0	0
CAF/ICC	0	0	0	0	0	0	0
SNA	0	0	0	0	0	0	0
SVS	0	0	0	0	0	0	0
Lifeline	916	1,799	1,802	1,802	612	1,497	1,005
Total	$240,831	$458,327	$383,813	$293,300	$427,782	$873,843	$1,397,653

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 6/30/2024 of REDACTED and REDACTED, respectively.

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

Conclusion – Affiliated and non-regulated services were reviewed and found reasonable.

All Corporate Operations expenses are paid by the Parent Holding Company (USCS) and charged back to the individual company. Individual expenses incurred for each company are charged to that company, both regulated and affiliates.

Allocated expenses are charged back to all companies based on the company revenues, both regulated and affiliates.

Annual management fees are set up as an estimate and trued up to actual expenses on a quarterly basis.

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

Conclusion - Total costs charged to the regulated company by the parent company were REDACTED for the year ending 6/30/2024. The costs do not appear unreasonable and therefore, no affiliate audit is recommended.

Cost per Access Line

Quantified costs by FCC USOA Account and determined the per access line amount over the past 3 years. Waverly had the highest Transmission Expense in Account 6230. If the costs appeared unreasonable, proposed adjustments or informed GPSC staff and recommended an affiliated transactions engagement be performed.

Because of the size of the Company and management's operational effectiveness, costs were reasonable as compared to other Georgia companies.

Procedure 25 For ACAM UAF companies only, obtained 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 Finalized work papers and prepare final report.

Procedure 28 Prepared testimony if requested.

Exhibit Nos. 1 – 3

1. Waverly Hall Telephone, LLC Organization Chart
2. Waverly Hall Telephone, LLC UAF Net Operating Income and Rate of Return on Rate Base Calculation
3. Waverly Hall Telephone, LLC UAF Cost of Capital Structure and Return on Equity Calculation

1. Waverly Hall Telephone, LLC Organization Chart - REDACTED

Exhibit 3- REDACTED