

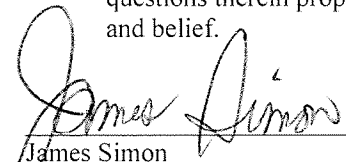
**BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI**

In the Matter of the Application of)
Chariton Valley Telecom Corporation)
For Designation as a Telecommunications)
Carrier Eligible for Federal Universal) Case No. TO-2005-0423
Service Support pursuant to Section)
254 of the Telecommunications Act of)
1996.)

AFFIDAVIT OF JAMES SIMON

James Simon, of lawful age, being duly sworn, deposes and states as follows:

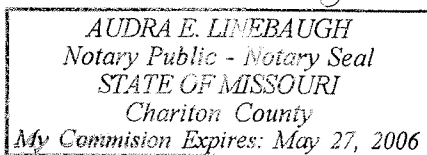
1. My name is James Simon. I am employed as General Manager of Chariton Valley Telecom Corporation.
2. Attached hereto and made a part hereof for all purposes is my direct testimony.
3. I hereby affirm that my answers contained in the attached testimony to the questions therein propounded are true and correct to the best of my knowledge and belief.


James Simon

Subscribed and sworn to before me this 31 th day of Aug., 2005.

 Notary Public

My Commission expires: May 27, 2006



1 **Q. Please state your name, business address, and occupation.**

2 A. My name is James Simon, 109 Butler Street, Macon, Missouri, 63552. I am the
3 General Manager of Chariton Valley Telephone Corporation and its various affiliates,
4 including Chariton Valley Telecom Corp. (CVT), the Applicant in this proceeding.

5 **Q. Please describe your educational and employment background?**

6 A. In 1970 I attended Southwest Minnesota Vocational School, Jackson, Minnesota; I
7 attended Western Iowa Tech, Sioux City, Iowa and Wayne State College, Wayne,
8 Nebraska as a non-traditional student from 1988 to 1992.

9 Prior to 1975 I worked for Telephone Data Systems in Wisconsin, and for
10 Winnebago Telephone Cooperative Association in Iowa as a telephone technician.
11 From 1975 to 1977 I was Plant Manager of Northwest Telephone Cooperative
12 Association in Havelock, Iowa. In 1977 I became General Manager and served in that
13 capacity until 1986. From 1986 to 1989 I was employed by ICORE, Inc., located in
14 Sergeant Bluff, Iowa, as Vice President of Data Management Services. From 1989 to
15 1992 I was employed by Nixon Communications, Inc. and Northwest Iowa
16 Telephone Company, Sergeant Bluff, Iowa, as General Telecommunications
17 Consultant and Telephone Company Assistant Manager.

18 From 1992 to 1999 I was the General Manager of Green Hills Telephone
19 Corporation, Breckenridge, Missouri. From 1999 to May 2000 I was the Vice
20 President of Operations and General Manager of Cass County Telephone Company
21 and LEC, LLC, Peculiar, Missouri. From 2000 to 2001 I was the Vice President of
22 Operations for OutReach Communications, LLC, Kansas City, Missouri. From 2001

1 to 2004 I was the Assistant General Manager of Chariton Valley Telephone
2 Corporation, Macon, Missouri. I became General Manager of Chariton Valley in
3 November of 2004.

4 **Q. Have you served on industry committees?**

5 A. Yes, I have served on various industry committees including the National Telephone
6 Cooperative Association Industry Committee, the Iowa Telephone Association Safety
7 Committee, the Iowa Telephone Association Tariff Committee (past chairman), and
8 the Missouri Telephone Association - Reorganization Steering Committee. I also
9 served as a Board Member of Missouri Telecommunications Industry Association and
10 as a Director of the Rural Iowa Independent Telephone Association.

11 **Q. Were you involved in the start up of Chariton Valley Telecom?**

12 A. Yes. I was given primary responsibility for development of the business plan and pro
13 forma financial projections. I also led the door-to-door market research survey efforts
14 and subsequently was responsible for construction of the fiber-to-the-premise build-
15 out.

16 **Q. When was Chariton Valley Telecom Incorporated?**

17 A. Chariton Valley Telecom was incorporated in the State of Missouri September 24,
18 2001.

19 **Q. What certificates does CVT possess from the Missouri Commission?**

20 A. The Missouri Public Service Commission granted a Certificate of Service Authority
21 to Provide Basic Local Exchange Service, Local Exchange Service, and Exchange
22 Access Service on June 14, 2002 under Case No. TA-2002-238.

1 **Q. Does CVT have tariffs to provide telecommunications service?**

2 A. CVT's tariff PSC MO. NO. 1 is on file with the Missouri Public Service Commission.
3 CVT's TARIFF F.C.C. NO. 1 is on file with the Federal Communications
4 Commission.

5 **Q. Does CVT have approved interconnection agreements with which to exchange**
6 **traffic?**

7 A. CVT has an approved interconnection agreement with Spectra Communications
8 Group, LLC, and a separate approved agreement with SBC Missouri that SBC
9 required of CVT before SBC would route terminating toll traffic to CVT customers.
10 CVT recently adopted one of the interconnection agreements resulting from the
11 multi-party arbitration with Southwestern Bell Telephone, L.P. d/b/a SBC Missouri,
12 in Case No. TO-2005-0336.

13 **Q. Where is CVT certificated to provide service?**

14 A. CVT is certificated to provide service in the large local exchange carrier exchanges of
15 Southwestern Bell Telephone Company, Sprint Missouri, Inc., Verizon, Spectra
16 Communications and ALLTEL Communications.

17 **Q. Who is listed as the incumbent local exchange company for the Macon, Missouri**
18 **exchange?**

19 A. The incumbent local exchange company for the Macon, Missouri exchange is Spectra
20 Communications Group, LLC.

21 **Q. Is CVT a facilities based provider?**

22 A. CVT is a facilities based provider using a fiber-to-the-premise network.

1 **Q. Please describe the network CVT has installed in Macon?**

2 A. CVT constructed an underground fiber-to-the-premise network using passive optical
3 network (PON) technology. The network consists of four (4) fiber nodes within the
4 city limits of Macon with fiber buried to most business and residential locations.

5 **Q. Why is CVT seeking ETC designation?**

6 A. CVT is seeking ETC designation to assist in paying for the significant investment to
7 provide a state-of-the-art fiber-to-the-premise network in Macon. ETC funds will
8 assist in providing line extension to areas presently un-served by CVT's facility based
9 network. ETC funds will also assist in meeting the expense of operating CVT's
10 telephone business on an ongoing basis. As Spectra receives USF funds for Macon,
11 CVT's receipt of the same per-line level of support would provide competitive parity
12 between Spectra and CVT.

13 **Q. For what service area is CVT seeking ETC designation?**

14 A. The exchange of Macon, Missouri.

15 **Q. Is CVT seeking any modifications to Spectra's service area as part of CVT's**
16 **ETC designation?**

17 A. CVT is seeking a redefinition of Spectra's service area for the purpose of designating
18 CVT's service area. This will not affect Spectra's study area, or Spectra's USF
19 receipts. I am advised that this redefinition process is required by the FCC. If this
20 Commission grants ETC status to CVT with the Macon exchange as its service area
21 redefined from Spectra's service area, CVT requests that that Order also authorize
22 CVT to file this redefinition order with the FCC for its concurrence.

1 **Q. Has CVT been contributing to the federal USF?**

2 A. Yes, CVT has been assessing the federal end user charge to its customers and passing
3 this on to the fund as have other carriers.

4 **STATUTORY ETC ELIGIBILITY REQUIREMENTS**

5 **Q. 47 USC 214 (e) provides that a common carrier designated as an eligible**
6 **telecommunications carrier under paragraph (2), (3), or (6) shall be eligible to**
7 **receive universal service support in accordance with section 254 of this title and**
8 **shall, throughout the service area for which the designation is received –**

- 9 **(A) offer the services that are supported by Federal universal service**
10 **support mechanisms under section 254(c) of this title, either using its**
11 **own facilities or a combination of its own facilities and resale of**
12 **another carrier's services (including the services offered by another**
13 **eligible telecommunications carrier); and**
14 **(B) advertise the availability of such services and the charges therefore**
15 **using media of general distribution.**
16

17 **Does CVT meet the criteria of (A) and (B)?**

18 A. Yes. With respect to (A), CVT offers the services supported by the federal universal
19 service fund using its own facilities. The specific services supported, and the manner
20 in which CVT provisions them, will be addressed in more detail later.

21 With respect to (B), while in its start up mode CVT aggressively advertised
22 itself as a full service provider providing all services that the incumbent LEC
23 provided. At this time it is fair to say Macon residents are aware of CVT service
24 offerings.

25 Recently, CVT has prepared to publish newspaper advertisements of the
26 nature required of ETCs. CVT is prepared to publish, in the Macon Chronicle, the

1 primary local newspaper publication serving Macon, a notice intended to assure
2 compliance with (B). A copy of this prepared notice is attached hereto as JS
3 Schedule 1. CVT has systems in place to place this type of notice in that newspaper
4 on a regular basis. If CVT is designated ETC, it will make these publications.

5 **Q. While we are on the subject of notifications, the FCC requires that ETCs**
6 **must commit to advertise the availability of Lifeline and Link Up services in a**
7 **manner reasonably designed to reach those likely to qualify for those services.**
8 **What has CVT done to be in a position to comply with this requirement to more**
9 **specifically target notifications designed for Lifeline and Link Up?**

10 A. CVT has developed a more targeted program regarding Lifeline and Linkup
11 eligibility. Lifeline and Linkup eligibility notifications will be published in the
12 newspaper. Our current draft is attached as JS Schedule 2. Upon receipt of ETC
13 designation CVT will periodically send this information by letters to local social
14 services and community action offices likely to have clients meeting Lifeline and
15 Linkup eligibility requirements.

16 **Q. 47 USC 214 (e)(2) provides that the Missouri Commission may, consistent with**
17 **the public interest, convenience, and necessity, in the case of an area served by a**
18 **rural telephone company, designate more than one common carrier as an ETC.**
19 **Is Macon an area served by a rural telephone company?**

20 A. I believe so. Spectra has been certified by the Commission as the original ETC for
21 Macon. I also know Spectra has filed with the Universal Service Administrative
22 Company (USAC) disaggregation zone maps. In Spectra's filings with this

1 Commission and with USAC, Spectra presented Macon as a rural area with Spectra as
2 the serving rural telephone company.

3 **Q. Has the Missouri Commission previously designated any ETCs in Spectra's**
4 **rural areas?**

5 A. Yes. At present there are two ETCs in Spectra's areas, Spectra itself as the
6 incumbent ETC, and Mark Twain Communications as a competitive ETC. On June
7 15, 2000 in TA-2000-591 Mark Twain Communications received the ETC
8 designation. At that time the Commission had approved the transfer of GTE
9 Missouri exchanges to Spectra, and the transaction had yet to be closed. I believe that
10 Mark Twain Communication's ETC designation was for the Spectra exchanges of
11 Ewing, Lewistown, and LaBelle. These three exchanges, like the Macon exchange,
12 have been certified by Spectra as rural areas. About a month and a half later, on July
13 27, 2000 in TA-2000-817, the Commission designated Spectra as an ETC for the
14 exchanges it acquired from GTE.

15 **Q. Has the Commission granted ETC status to other CLECs?**

16 A. Yes. It is my information that in addition to Mark Twain Communications, ExOp of
17 Missouri Inc., Green Hills Telecommunications Services, and an affiliate of Fidelity
18 Telephone Company have all received ETC designations. There may be others I am
19 unaware of.

20 **Q. What is the significance of these other CLEC ETC designations?**

21 A. The Commission should consider the effects of competitive ETC designation upon
22 competition and consumer welfare. It appears from these other CLEC ETC

1 designations in rural ILEC areas that the Commission recognizes it is in the public
2 interest to designate competitive ETCs in the same areas served by incumbent ETCs.
3 With respect to 47 USC 214 (e)(2), it appears that the Missouri Commission believes
4 such designations within areas served by a rural telephone company are in the public
5 interest.

6 It also appears that the Missouri Commission's view is consistent with FCC
7 decisions recognizing that the designation of competitive ETCs promotes
8 competition, which enhances the public interest by increasing customer choice, and
9 promoting new or innovative technologies and services. Doing so here will target
10 these benefits to Macon.

11 **Q. Are you aware of any difference between CVT and Mark Twain**
12 **Communications in this regard?**

13 A. No. We are both CLECs providing service in areas served by Spectra. Spectra has
14 filed disaggregation plans providing two zones of USF support. Mark Twain serves
15 three of Spectra's 107 exchanges. CVT serves one of Spectra's 107 exchanges.

16 **Q. Is CVT willing to provide the documentation required by the FCC and Missouri**
17 **Commission to verify continued eligibility, as well as appropriate use of USF**
18 **funds?**

19 A. Yes. I am aware of recent changes to these requirements, and the possibility these
20 requirements may continue to evolve. CVT fully intends to meet these requirements.

21 **Q. If CVT receives an ETC designation, and thereafter receives USF support, what**
22 **would be the impact upon Spectra?**

1 A. Based upon the present disbursement system used by the Universal Service
2 Administrative Company (USAC), there would be no impact upon Spectra.
3 Incumbent ETC support is not reduced by support competitive ETCs receive for lines
4 in the incumbent's area.

5 **Q. Do you believe that CVT's customer base consists of lines actually captured from**
6 **Spectra, or new lines that Spectra would have served absent CVT's presence in**
7 **Macon?**

8 A. Yes.

9 **Q. What is the level of per line support CVT would be eligible to receive for lines it**
10 **captures or new lines it serves?**

11 A. Spectra's disaggregation plan has Macon as a "Zone 1" exchange for which
12 competitive ETCs would receive \$1.76 per month per line in USF high cost loop
13 support, \$1.83 per month per line in USF in interstate common line support, with
14 nothing to be received for long term support or local switching support. CVT would
15 receive a total monthly amount per line of \$3.59.

16 **Q. Can CVT put these USF funds to good use?**

17 A. Yes. Such funds would be of assistance in keeping customer service rates
18 competitive. Such funds would assist in paying for the significant investment in
19 facilities CVT has made in Macon. Such funds would assist in providing further
20 extensions of facilities and services necessary to serve new customers. Such funds
21 would also assist in meeting the expenses of operating CVT's telephone business on
22 an ongoing basis.

FEDERAL RULE ETC ELIGIBILITY REQUIREMENTS

Q. Please list the eligibility requirements found in FCC Rules?

A. 47 CFR 54.101(b) indicates an ETC must offer all services listed in subsection (a) in order to receive universal service support. The services designated in subsection (a) for universal support are as follows:

1. Voice grade access to public switched network, further defined by the FCC to mean the ability to make and receive phone calls within a bandwidth of approximately 2700 Hertz, within the 300 to 3000 Hertz frequency range.
2. Local usage (amount of minutes of use of exchange service provided free of charge to end users).
3. Dual tone multi-frequency signaling or functional equivalent.
4. Single party service or functional equivalent.
5. access to emergency services (911 and E911) to PSAP with ANI and ALI.
6. access to operator services.
7. access to interexchange service.
8. access to directory assistance.
9. toll limitation for qualifying low-income individuals, further refined by the FCC as the provision of either toll blocking or toll control.

Q. Does CVT offer these nine services?

A. CVT has been offering all nine services since it began offering service to customers in November of 2003. Specifically:

1. CVT customers have full access to the public switched network with the ability to make and receive phone calls within the bandwidth and frequency range required by the FCC.

2. CVT customers who subscribe to local exchange service have unlimited local usage within the exchange.
3. Dual tone multi-frequency signaling is provided to all CVT local exchange customers.
4. All CVT local exchange customers receive single party service.
5. All CVT local exchange customers have access to emergency services (911 and E911) to the local PSAP with ANI and ALI.
6. All CVT local exchange customers receive access to operator services.
7. All CVT local exchange customers receive access to interexchange service.
8. All CVT local exchange customers receive access to directory assistance.
9. All CVT local exchange customers have access to toll blocking service as outlined in the Lifeline Service section of the company's tariff.

Q. Rule 54.101 (c) authorizes the Missouri Commission to grant CVT additional time to perform network upgrades for single party service, toll limitation, or 911 services, subject to certain conditions. Does CVT need this additional time?

A. No.

Q. By a March 17, 2005 FCC decision, the FCC adopted additional rule 54.202 dealing with CMRS ETC eligibility standards. The Joint Board and FCC both recommended that States adopt these requirements as part of the 214(e)(2) designation process. The Missouri Commission is currently considering the adoption of a rule in this regard. Would you present the ability of CVT to meet these additional requirements?

A. Yes. Rule 54.202 requires ETCs to meet the following additional requirements:

54.202 (a)

- (1) commit to provide service throughout service area upon reasonable request for service. CVT must certify that it will:
 - (A) provide timely service to requesting customers where CVT's network already passes the customer's premises;
 - (B) provide service within a reasonable period of time to potential customers within Macon where CVT's network does not exist, by one of various methods, and submit a 5 year plan that describes with specificity the proposed improvements or upgrades in Macon, demonstrating how signal quality, coverage or capacity will improve with the receipt of high-cost support, the projected start and completion dates for each improvement, the estimated amount of investment for each project funded by high-cost support, and the specific geographic areas where improvements will be made and the estimated population that will be served as a result.
- (2) demonstrate its ability to remain functional in emergency situations, including a demonstration of reasonable back up power, ability to reroute traffic around damaged facilities, and capability of managing traffic spikes resulting from emergency situations.
- (3) demonstrate that CVT will satisfy applicable consumer protection and service quality standards.
- (4) demonstrate that CVT offers local usage plans comparable to that of Spectra.
- (5) certify that CVT acknowledges it may have to provide equal access to long distance providers if no other ETC serves.
- (c) CVT must undergo a creamskimming analysis that compares the population density of each wire center in which ETC designation is sought compared to other wire centers in the study area where ETC is not sought, considering factors such as disaggregation of support pursuant to §54.315.

Q. When must CVT submit the detailed information required by this new rule?

A. These new additional rules became effective June 24, 2005. CVT filed its application on May 17, 2005. Under Rule 54.202(b), CVT is not required to submit this information before October 1, 2006. In this testimony I will attempt to

1 demonstrate CVT's ability to meet these additional requirements now. However,
2 CVT will not be able at this time to provide the degree of specificity required by this
3 rule for a detailed 5 year build out plan.

4 **Commitment to Serve**

5 **Q. Does CVT commit to provide service throughout the Macon exchange to all**
6 **customers making a reasonable request for service?**

7 A. Yes.

8 **5 Year Plan**

9 **Q. Although CVT is not required to submit a five year plan that describes with**
10 **specificity proposed improvements to CVT's network throughout Macon, can**
11 **you provide an overview of such a plan at this time?**

12 A. Yes. Within the city of Macon, CVT has constructed fiber optic cable routes past
13 every residence and business location, both those served by CVT and those served by
14 Spectra. Fiber drops have been placed to every residence and business location that
15 gave CVT permission to do so. With respect to the majority of potential customers in
16 the Macon exchange, CVT presently has the ability to provide service to these
17 customers within a reasonable time of their request for service.

18 With respect to customers in the exchange outside the city limits of Macon,
19 CVT does have some fiber facilities going to, or passing by, particular customer
20 locations. Where CVT does not have a readily accessible facility, under the terms of
21 the approved interconnection agreement with Spectra CVT can purchase the use of
22 unbundled local loops from Spectra in order to provide service. CVT is also working

1 on the deployment of wireless technologies that would enable CVT to provide service
2 in Macon.

3 Using CVT's fiber network or Spectra's unbundled loops, CVT is presently
4 capable of providing service throughout the entire Macon exchange. The details of a
5 five year build out plan will require more development by the operations and
6 engineering departments.

7 **Emergency Situation Functionality**

8 **Q. Please describe how CVT is capable of remaining functional in emergency**
9 **situations?**

10 A. The CVT network in Macon consists of four fiber nodes on a fully protected ring
11 which connects to the local switch in Huntsville, Missouri. The protected ring assures
12 continued service to the nodes if the fiber transport cable is cut. CVT fiber
13 distribution node locations are equipped with eight hour reserve back-up battery
14 power plants. In addition, each fiber node location is equipped with a fixed location
15 standby generator. The generators are exercised weekly to assure operation in an
16 emergency. Fiber transport capacity to the fiber nodes exceeds 100% of the potential
17 premise locations to be served by each node. Network voice grade talk paths are
18 engineered to assure a high reliability of access to dial tone. The current ratio of talk
19 paths to premise locations is 3 to 1. CVT is capable of avoiding or managing traffic
20 spikes.

CVT has had this system in place since the outset of operations in Macon in 2003. CVT has experienced no inability to remain functional in emergency situations.

Consumer Protection and Service Quality

Q. As an ETC, CVT will be required to demonstrate it will satisfy consumer protection and service quality standards. Can CVT do that?

A. Yes, CVT can and is doing that now. CVT strives to comply with the service quality standards outlined in Chapter 32 of the rules of the Missouri Public Service Commission. CVT meets or exceeds the metering, inspection, and testing standards, customer service standards, engineering and maintenance standards, quality of service levels, service objectives and surveillance levels, inside wiring and equipment connection requirements, the minimum requirements of provisioning basic local service and access to toll service, the snap-back requirements, customer disclosure requirements, and caller ID blocking services.

With respect to consumer protection, CVT meets the requirements of Chapter 33 and Chapter 34. These requirements deal with billing and payment standards, deposits, responding to customer inquiries, discontinuance of service procedures, customer dispute resolution procedures, adherence to the slamming rules, and adhering to the rules protecting customer proprietary network information.

Comparable Usage Plans

Q. The new federal rules require a demonstration of a local usage plan comparable to that of the ILEC. Would you provide this demonstration?

1 A. Yes. Both CVT and Spectra offer local unlimited calling in their local service
2 offerings. Spectra recently filed a tariff effective September 1, 2005 indicating their
3 local service rate for a business line will be \$15.76, and \$8.58 for a residential line.
4 CVT's local residential rate is \$7.50 and its business rate is \$15.00. In addition,
5 CVT offers optional plans for extended local calling scopes.

6 **Equal Access**

7 **Q. The rules require CVT to acknowledge that it may be required to provide equal**
8 **access to long distance carriers in the event no other ETC is providing equal**
9 **access within Macon. Is CVT willing to provide equal access in this event?**

10 A. Yes. CVT is providing equal access today. It will not be a service issue to continue
11 to do so.

12 **Q. The Missouri Office of Public Counsel has suggested that, in addition to the**
13 **equal access requirement, ETCs accept carrier of last resort obligations. What**
14 **is CVT's position with respect to accepting this obligation?**

15 A. CVT is willing to accept the carrier of last resort obligation. As I understand the
16 term, there can be only one "carrier" of last resort. Spectra and CVT cannot both
17 simultaneously be the carrier of last resort. Spectra is presently prohibited from
18 abandoning service without a Commission finding that will not deprive customers of
19 basic local service or access to interexchange service. In the event Spectra desires to
20 leave Macon, CVT will be willing to assume carrier of last resort responsibilities.

21 **Public Interest/Creamskimming Analysis**

22 **Q. Will you please summarize the FCC's creamskimming analysis?**

1 A. In its May 25, 2005 Report and Order accompanying new rules found in 47 CFR
2 54.202, the FCC described “creamskimming”. It stated that when a competitive
3 carrier requests the ETC designation for an entire rural service area, this does not
4 create creamskimming concerns. The potential for creamskimming was said to occur
5 when the ETC seeks designation in a disproportionate share of the higher-density
6 wire centers in an ILECs service area. The FCC said that where the ILEC’s support
7 was based upon the average costs of support in its entire study area, an ETC serving a
8 high-density wire center receiving support for a higher-density wire center than the
9 ILEC receives for that same wire center could be viewed as creamskimming, unless
10 the ILEC has disaggregated its support.

11 The FCC went on to state that the disaggregation alleviates creamskimming
12 concerns. The FCC left the door open to evaluate creamskimming even in a
13 disaggregated ILEC zone where the ILEC’s service area includes wire centers with
14 “widely disparate” population densities.

15 **Q. Please apply this analysis to CVT and Macon?**

16 A. CVT has invested in fiber facilities throughout Macon. I can assure the Commission
17 this was an expensive proposition. CVT’s actual cost of installation per line exceeds
18 the \$3.59 per line per month amount of USF available to CVT under Spectra’s
19 disaggregation plan. The essential creamskimming concern—that an ETC will serve
20 low cost portions of a study area while receiving USF support based on an overall
21 higher average cost spread across Spectra’s entire study area—does not exist here.

1 The redefinition of CVT's service area to be Macon only will not result in
2 creamskimming.

3 Spectra has filed a disaggregation plan. According to the FCC, this alleviates
4 the need for a detailed creamskimming analysis, unless Spectra's 107 wire centers in
5 its study area have widely disparate population densities.

6 Referring to Spectra's May 15, 2002 self-certified disaggregation plan filed
7 with the Missouri Commission, Spectra receives average per line support of \$10.80
8 per month for all 130,651 lines in all 107 exchanges. A copy is attached hereto as JS
9 Schedule 3. Spectra has established two cost zones, Zone 1 and Zone 2. Zone 1
10 consists of 13 exchanges, including Macon. Zone 2 consists of the other 94
11 exchanges. The Zone 1 exchanges range from 947 to 7,252 access lines. The Zone
12 2 exchanges range from 57 to 4,786 access lines. There is overlap in exchange
13 densities of the two zones. In one extreme a 947 line exchange is a Zone 1 "low cost"
14 exchange. In another extreme a 4,786 line exchange is a Zone 2 "high cost"
15 exchange.

16 Although there is some disparity in the population densities of the Spectra
17 exchanges, it appears that Spectra's disaggregation plan has taken these into account.
18 Macon, as a Zone 1 exchange, permits the ETC to recover \$3.59 cents per line, which
19 is about 1/2 of the average cost. Zone 2 exchanges qualify for \$15.21 per line per
20 month, about one and 1/2 times the average cost.

21 Spectra has created per line USF rates that provide a disincentive for
22 creamskimming. Designating CVT as an ETC will not provide it with a competitive

1 advantage over Spectra. Designating CVT as ETC for a Macon service area will not
2 undermine Spectra's ability to serve its entire study area.

3 **Q. Please explain why CVT chose to serve Macon?**

4 A. CVT's parent, Chariton Valley Telephone Corporation, is a small rural member-
5 owned ILEC. It serves eighteen exchanges to the north, west, and south of Macon.
6 It had already created expanded calling plans that included Macon. Macon lies within
7 the Chariton Valley Telephone members' communities of interest. Chariton Valley
8 Telephone decided to create CVT as a CLEC to compete with Spectra in Macon only.
9 Macon was chosen because it was bordered on three sides by Chariton Valley
10 Telephone exchanges.

11 CVT knew in 2003 what the level of per line support was for the various
12 Spectra exchanges. Macon was chosen in spite of its comparatively smaller support
13 amount available, not because of it. CVT did not seek to serve in Macon because it
14 was a low cost, high revenue opportunity. If that were the case CVT would have
15 served other Spectra exchanges where the USF revenues are \$ 15.31 per line per
16 month, as opposed to the \$3.59 available in Macon.

17 **Q. What will be the impact on the federal universal service fund if CVT is**
18 **designated an ETC in Macon?**

19 A. It will be minimal. Even if CVT captured all 5,063 access lines shown on Spectra's
20 disaggregation plan (which CVT has not done), CVT would draw about \$18,000 in
21 support per month. In the *Virginia Cellular* decision the FCC concluded that

1 \$899,706 in support per quarter would not overburden the fund. CVT's theoretical
2 maximum is less than one tenth of the *Virginia Cellular* amount.

3 **Q. The FCC's Report and Order accompanying these new rules also included in the**
4 **public interest analysis an examination of the benefits of increased consumer**
5 **choice, and the unique advantages or disadvantages of the CVT's service**
6 **offering. Would you provide your thoughts as to this analysis for CVT in**
7 **Macon?**

8 A. Yes. It is accepted that increased choice is a consumer benefit. Customers in Macon
9 have had this benefit since CVT's entry. A significant advantage of CVT over
10 Spectra in Macon is that CVT deploys service over fiber. Fiber possesses bandwidth
11 capacities enabling voice, data, and video to be deployed over a single facility to the
12 customer. Not only does fiber provide greater bandwidth capacities than copper, it is
13 less susceptible to quality of service issues.

14 The customers in Macon can choose from a menu of services from multiple
15 providers. At one extreme customers can stay with voice-only telephone service
16 provided by Spectra over copper facilities, with a single bill for that single service.
17 Another option is to purchase voice over copper from Spectra, with data or video
18 service provided over fiber, with multiple bills. At the other extreme customers can
19 obtain his or her choices as to voice, video, and data services provided over fiber
20 facilities, and pay for this on a single bill.

1 **STATE ETC ELIGIBILITY REQUIREMENTS**

2 **Q. The Missouri Commission is considering 4 CSR 240-3.570, Requirements for**
3 **Competitive Carrier Requests for Designation as Eligible Telecommunications**
4 **Carriers. It appears that the Commission and its Staff have considered**
5 **different drafts, but no final rule has been prepared. Is CVT willing to comply**
6 **with Missouri ETC eligibility requirements?**

7 **A. Yes, as long as those requirements are consistent with the federal requirements.**

8 **Q. Does this conclude your direct testimony?**

9 **A. Yes.**

JS Schedule 1

Chariton Valley Telecom Corporation is a quality telecommunications services provider who provides basic and enhanced services at reasonable rates within its service territory. Basic services are offered at the following rates:

Monthly Rate	
Single Party Residence Service	\$ 7.50
Single Party Business Service	\$15.00
Single Party Residence Service Using Spectra Facilities	\$29.50
Single Party Business Service Using Spectra Facilities	\$37.00
Federal Subscriber Line Charge-Single Line	\$ 6.50
Tone Dial Service	No Charge
Toll Blocking	\$4.10 (See Note)

Directory Assistance - The first three direct dialed calls per month are free, each additional direct dialed call is charged \$.50 per request.

Emergency 911 Services – Surcharges for 911 services are assessed according to government assessments.

Low-income individuals eligible for Lifeline and Link-Up telephone assistance programs may be eligible for discounts from these basic local charges through state specified telephone assistance plans.

Basic services are offered to all consumers in the Chariton Valley Telecom Corporation service territory at the rates, terms and conditions specified in the Company's tariffs. If you have any questions regarding the Company's services, please call us at (660) 395-9000 or 1-888-443-5079, or visit our business office at 1714 Prospect Drive, Macon, Missouri for further information regarding our services.

Note - Toll Blocking is available at no charge for low-income customers that qualify.

JS Schedule 2

Low Income Assistance Available for Telephone Service

Chariton Valley Telecom Corporation is a quality telecommunications services provider which provides basic and enhanced services at reasonable rates. Link Up Missouri and Lifeline Service are federal programs offering telephone discounts to low-income consumers in the United States.

Who is eligible for Link Up Missouri or Lifeline Service?

A consumer who participates in one of the following assistance programs:

- Medicaid
- Food Stamps
- Supplemental Security Income (SSI)
- Federal Public Housing Assistance
- Low-Income Home Energy Assistance Program (LIHEAP)
- Is disabled as defined in Missouri Statute 660.100

Consumers must sign, under penalty of perjury a document certifying:

- a. They are receiving benefits from one of the programs listed above.
- b. Name of the program(s) from which they are receiving benefits.
- c. That they will notify the company if they no longer participate in the program(s) named.

What funds are available to low-income customers?

The discounts are applied to the phone service at the applicant's principal place of residence. There shall be only one telephone line serving the residence. Eligible Link Up Missouri subscribers, for initial installation of phone service, will be discounted at a rate of 50 percent or \$30.00, whichever is less. The subscriber may defer payment on up to \$200 of the above charges without interest for a period not to exceed one year. Eligible Lifeline subscribers will receive a total reduction of their residential access line rate for one party service of \$5.25. The components of the reduction to basic residential one-party rates are as follows:

State reduction in local rate:	\$1.75
Federal baseline Lifeline reduction:	\$3.50

Toll Blocking Service provides a means of restricting access to the Long Distance Message Telecommunications Network. Toll Blocking for the purpose of Lifeline Service will restrict 1+, 0+ and 0- (operator handled) calls.

If the customer chooses "Toll Blocking Service" the company will not charge a service deposit.

Toll Blocking Service is offered to Lifeline Subscribers at no charge.

How are Link Up Missouri and Lifeline Service funded?

1 Funding for these programs are obtained from support mechanism to which all
2 telecommunications carriers that provide interstate and intrastate telecommunications services
3 contribute on an equitable and nondiscriminatory basis.
4

5 **How will the reductions appear on your phone bill?**

6 Reductions will appear on the bill as a separate line item and will show as a credit.
7



Chariton Valley Telecom Corp
1714 Prospect - Macon, MO
660-395-9000

P.O. Box 4065
 Monroe, LA 71211-4065
 Tel 318 388 9000

May 10, 2002

Public Information Office, Governor Office Building
 200 Madison Street
 PO Box 360
 Jefferson City, MO 65102-0360
 Attn: Dale Hardy

dk
~~Missouri Public Service Commission~~
CENTURYTEL
RECEIVED
 FILED MAY 22 2002
 MAY 15 2002
 UTILITY OPERATIONS
 DIVISION

Re: Certification of Spectra Communications Group, LLC, Study Area 421151, to Disaggregate and Target High Cost Universal Support, pursuant to 47 C.F.R. 54.315 under Path 3

Dear Mr. Hardy,

On behalf of Spectra Communications Group, LLC, Study Area 421151, I write to certify that Spectra Communications Group, LLC elects to disaggregate and target high-cost universal service support under Path 3. This election is made for the four year period established in 47 C.F.R. 54.315(b) and will remain in effect unless revised in accordance with in 47 C.F.R. 54.315(b)(4). The following enclosures demonstrate that the Company's plan complies with the requirements established by the FCC for Path 3 election and for disaggregation filings as set out in 47 C.F.R. 54.315:

- documentation supporting our methodology and rationale
- map(s) of the study area

I certify that I am authorized to make such certification on behalf of Spectra Communications Group, LLC.

In the event you have any questions regarding this certification, please contact Ken Matzdorff at 816-779-8250 or Kenneth.matzdorff@centurytel.com. I can be reached at 318-388-9648 or Jeff.glover@centurytel.com.

Sincerely,

Jeffrey S. Glover

Jeffrey S. Glover
 Vice President External Relations
 For Spectra Communications Group, LLC

Enc.

cc: Universal Service Administration Company, 2120 L Street, NW, Suite 600, Washington, D.C. 20037
 John Van Eschen, Director Telecommunications Division, Missouri Public Service Commission, Public Information Office, Governor Office Building, 200 Madison Street, PO Box 360, Jefferson City, MO 65102-0360
 Office of Public Counsel, Governor Office Building, Suite 650, 200 Madison Street, P.O. Box 7800, Jefferson City, MO 65102-7800
 Trip England - via email - trip@brydonlaw.com

Spectra Communications Group, LLC
Study Area Code No. 421151

Introduction

1. This filing is made on behalf of Spectra Communications Group to propose the disaggregation of explicit federal high-cost support in its Spectra Communications Group study area in the state of Missouri. This study area has been assigned the Study Area Code number 421151. This filing is made pursuant to the Order of the Federal Communications Commission in CC Docket Nos. 96-45 and 00-256 that was issued on May 23, 2001, that became effective on June 19, 2001. This filing is made pursuant to, and is consistent with, Section 54.315 of the rules of the Federal Communications Commission which specifies the requirements for disaggregation filings.

Total Study Area Support

2. The total amount of support available to this study area without disaggregation is summarized in the following chart:

Support Summary

		Monthly	Per Line
High Cost Loop	HCL	\$693,057	\$5.30
Interstate Common Line Support	ICLS	\$718,090	\$5.50
Long Term Support	LTS	\$0	\$0.00
Local Switching Support	LSS	\$0	\$0.00
	Total	\$1,411,147	\$ 10.80

Description of Disaggregation Plan

3. This study area contains 107 wire centers.
4. This plan establishes two support zones for the entire study area. It therefore meets the criteria established in 54.315 that support be disaggregated "into no more than two cost zones per wire center". This disaggregation is done differently for loop -related (i.e., HCL, ICLS, and LTS) and switch-related (i.e., LSS) support mechanisms. The precise means by which this disaggregation is performed are described in the following sections.

5. The disaggregation plan provides support as follows for the High Cost Loop (HCL), Interstate Common Line Support (ICLS), Long Term Support (LTS), and Local Switching Support (LSS) explicit federal support mechanisms:

<u>HCL</u>		<u>ICLS</u>		<u>LTS</u>		<u>LSS</u>	
Zone 1	Zone 2	Zone 1	Zone 2	Zone 1	Zone 2	Zone 1	Zone 2
\$1.76	\$7.47	\$1.83	\$7.74	\$0	\$0	\$0	\$0

6. Loop related support is composed of High Cost Loop (HCL) support (Part 36, Subsection F), Interstate Common Line Support (ICLS), and Long Term Support (LTS) (Section 54.503). All of these mechanisms provide support to carriers with high loop costs. While the exact methods by which these mechanisms calculate support are not identical, each mechanism provides support in a manner in which the higher the loop cost of the carrier, the more support the carrier receives. In disaggregating the loop-related mechanisms this methodology seeks to define a lower-cost zone (Zone 1) where relatively less loop related support is appropriate. The remaining support assigned to this study area is then distributed to the remaining lines in the study area (Zone 2) on a uniform basis.
7. The identification of the lower-cost zone was accomplished using a publicly available proxy model, the Benchmark Cost Proxy Model Version 3.0 with FCC Common Inputs that was placed on the public record in CC Docket 96-45 by the model sponsors Bell South, Sprint and U S WEST on December 11, 1997. Copies of this model may be obtained from the FCC's document vendor International Transcription Services. It is important to note that this model data is used solely for purposes of distributing the fixed amount of total study area support. Furthermore, even though the cost data was submitted in late 1997, it utilizes a forward-looking cost methodology and a network architecture that is currently used today, and that is similar to that used in the FCC's Hybrid Cost Proxy Model (HCPM). The results of the BCPM3 with FCC Common Inputs correlate very well with the results of the HCPM. The computed results of the HCPM for the non-rural study areas are not publicly available, whereas the results from the BCPM3 with FCC Common Inputs are. For this reason this data forms a publicly available and reliable basis for assessing the relationship of cost and density.
8. The 107 wire centers in this study area were ranked based on their corresponding monthly loop cost as identified by the BCPM3 (See Column B, Exhibit 1). The BCPM3 loop support per wire center is identified in Column E of Exhibit 1. It was determined by comparing the wire center cost per line (Column C) to 115% of the nation wide average cost per loop (\$31.07). This difference was then multiplied by the access line count to determine the total monthly BCPM3 loop support for the wire center.
9. We then developed a factor to reconcile the BCPM3 loop support to the total actual study area loop support. The reconciliation factor is the total actual monthly loop support for the

study area divided by the sum of the BCPM3 loop support for all wire centers. The actual loop support per wire center is indicated in Column F and consists of the BCPM3 loop support multiplied by the reconciliation factor.

10. The thirteen lowest cost wire centers shaded on Exhibit 1 have been designated as Zone 1 (Column G). The remaining higher cost wire centers have been designated as Zone 2. Exhibit 2 is a map showing Zone 1 and Zone 2 wire centers.
11. The monthly loop support for Zone 1 is established at \$3.59 per line, this represents the total Zone 1 support divided by the total Zone 1 access lines on Exhibit 1. The monthly loop support for Zone 2 is established at \$15.22 per line, this represents the total Zone 2 support divided by the total Zone 2 access lines on Exhibit 2.
12. Switch-related support is composed of Local Switching Support (LSS) (Section 54.301). Since CenturyTel serves over 50,000 lines it is not eligible for switch-related support.

Total Disaggregated Support

13. The support provided by this disaggregation plan does not change the total support received by the study area. The total monthly loop support for Zone 1 (\$177,927) and Zone 2 (\$1,233,220) will produce this same level of total support indicated in Paragraph 2 above and the following chart:

<u>Lines</u>		<u>HCL Support</u>		<u>ICLS Support</u>		<u>LTS Support</u>		<u>LSS Support</u>		
Zone 1	Zone 2	Zone 1	Zone 2	Zone 1	Zone 2	Zone 1	Zone 2	Zone 1	Zone 2	Total
49,600	81,051	\$87,385	\$605,671	\$90,542	\$627,548	\$0	\$0	\$0	\$0	\$1,411,147

14. Based upon the foregoing, CenturyTel certifies that it meets the requirements of Part 54.315 of the FCC rules for this disaggregation plan.

CENTURYTEL OF MISSOURI, INC.

Study Area 421151
Company T095

	Monthly	Per Line
High Cost Loop	\$893,057	\$5.30
ICLS	\$718,090	\$5.50
Long Term Support	\$0	\$0.00
Pool	\$1,411,147	\$10.80
LSS	\$0	\$0.00

National Average Cost	\$27.02
Cascade Benchmark	115.0%
Funding	\$31.07
Access Lines	130,651

A	B	C	D	E	F	G
		BCPM3 Results	CenturyTel Data	MAX((C-31.07)/D,0)	E * (SPool /SUM(E))	
CLLI	Wire Center	Monthly Cost	Access Lines	Support Required	Actual Support	Zone
MAONMOXA	Macon	\$32.19	5,063	\$5,655	\$2,101	1
AJURMOXA	Aurora	\$33.48	5,673	\$13,656	\$5,073	1
SVNHMOXA	Savannah	\$33.59	3,783	\$9,534	\$9,542	1
CMRNMOXA	Cameron	\$37.28	5,552	\$34,461	\$12,603	1
MTVRMOXA	Mount Vernon	\$40.21	4,452	\$40,878	\$15,113	1
GNCRMOXA	Concordia	\$42.30	2,217	\$24,890	\$9,247	1
MTGVMOXA	Mountain Grove	\$43.54	4,681	\$58,358	\$21,682	1
CNTNMOXA	Canton	\$44.49	1,938	\$28,807	\$9,980	1
PLMYMOXA	Palmyra	\$44.62	3,218	\$43,594	\$16,196	1
MINCYMOXA	Monroe City	\$45.53	2,634	\$38,000	\$14,148	1
POTSMOXA	Polos	\$48.64	7,252	\$128,671	\$47,061	1
BRWKMOXA	Brunswick	\$49.03	847	\$17,005	\$6,318	1
KAHKMOXA	Kahoka	\$49.67	2,125	\$39,519	\$14,602	1
HSTNMOXA	Houston	\$50.05	3,574	\$55,832	\$25,944	2
LGRNMOXA	Lagrange	\$50.16	971	\$18,553	\$6,893	2
PLBGMOXA	Plattsburg	\$50.39	2,219	\$42,864	\$15,925	2
LWSNMOXA	Lawson	\$50.70	2,573	\$50,500	\$18,762	2
GNFDMOXA	Greenfield	\$50.62	1,774	\$35,031	\$13,015	2
SLBNMOXA	Shelbina	\$51.59	1,883	\$36,839	\$14,430	2
HMTNMOXA	Hamilton	\$51.73	1,624	\$33,547	\$12,464	2
IRTNMOXA	Irionton	\$52.22	3,990	\$84,377	\$31,343	2
SRCXMOXA	Sarcox	\$52.36	1,908	\$40,616	\$15,090	2
EDSPMOXA	Eldorado Springs	\$52.40	4,786	\$102,071	\$37,922	2
GOWRMOXA	Gower	\$54.86	1,276	\$30,352	\$11,277	2
LWTWMOXA	Lewistown	\$55.73	267	\$6,583	\$2,446	2
AVCYMOXA	Avenue City	\$55.77	448	\$11,054	\$4,111	2
NEBOMOX	Neco	\$56.11	452	\$11,317	\$4,204	2
LDONMOXA	Ladonia	\$56.31	529	\$14,837	\$5,550	2
IRDLMOXA	Irondale	\$56.33	646	\$18,500	\$7,022	2
LONGMOXA	Licking	\$61.20	2,737	\$82,459	\$30,835	2
BRYMMOXA	Braymar	\$62.62	813	\$25,648	\$9,529	2
TRMBMOXA	Trimble	\$63.36	380	\$12,582	\$4,579	2
HMVLMOXA	Humansville	\$63.47	1,386	\$44,902	\$16,882	2
BCTRMOXA	Birch Tree	\$63.82	1,185	\$36,805	\$14,417	2
PARSMOXA	Paris	\$63.06	1,842	\$60,394	\$22,438	2
SWVLMOX	Stewartsville	\$64.50	624	\$20,858	\$7,749	2
VNBRMOXA	Van Buren	\$64.62	1,718	\$57,834	\$21,412	2
WINOMOX	Winona	\$65.70	1,123	\$30,888	\$14,447	2
LSVLMOX	Lesterville	\$65.88	418	\$14,549	\$5,405	2
LPLTMOXA	La Plata	\$66.13	1,490	\$52,235	\$19,407	2
WEBLMOXA	Webleau	\$66.89	530	\$18,983	\$7,053	2
WYLMOX	Wayland	\$67.13	924	\$33,317	\$12,375	2
BLCKMOXA	Bolckow	\$67.37	226	\$8,203	\$3,048	2
RMVLMOX	Raymondville	\$69.48	520	\$19,452	\$7,227	2
ESTNMOXA	Easton	\$69.92	313	\$12,159	\$4,517	2
CLNCMOXA	Clarence	\$71.37	988	\$39,813	\$14,792	2
PRRYMOXA	Perry	\$71.57	1,050	\$42,522	\$15,796	2
OSCLMOXA	Oscola	\$71.65	1,920	\$77,908	\$28,945	2
RODLMOXA	Rosendale	\$72.29	346	\$14,261	\$5,298	2
HLNAMOX	Helena	\$72.48	288	\$12,339	\$4,564	2
MYVLMOX	Maysville	\$73.28	1,702	\$71,836	\$26,669	2
GDCYMOXA	Golden City	\$73.31	980	\$41,392	\$15,378	2
CSDLMOXA	Clarksdale	\$73.42	364	\$15,414	\$5,727	2

CLLI	Wire Center	Monthly Cost	Access Lines	Loop		
				Support Required	Actual Support	Zone
OSBRMOXA	Osborn	\$73.83	423	\$16,086	\$6,720	2
ANNPMOXA	Annapolis	\$74.80	927	\$40,071	\$14,888	2
WONGMOXA	West Quincy	\$74.37	275	\$11,907	\$4,424	2
BLGRMOXA	Belgrade	\$75.11	516	\$22,723	\$8,442	2
AMZNMOXA	Amazonia	\$75.19	413	\$18,220	\$6,769	2
KTVLMOXA	Keytesville	\$75.26	628	\$27,748	\$10,310	2
ELSNMOXA	Elsinore	\$75.81	1,135	\$50,549	\$16,780	2
BLVWMOXA	Bellvue	\$76.68	439	\$20,021	\$7,439	2
SHVLMOXA	Shelbyville	\$76.73	612	\$27,942	\$10,381	2
CLDNMOXA	Caledonia	\$76.78	612	\$27,960	\$10,388	2
HTVLMOXA	Hartsville	\$78.92	1,802	\$76,651	\$28,473	2
EMNNMOXA	Eminence	\$80.14	1,210	\$69,371	\$22,058	2
SHLNMOXA	Sheldon	\$80.74	764	\$37,946	\$14,098	2
JRSPMOXA	Jericho Springs	\$81.40	535	\$26,925	\$10,003	2
NRWDMOXA	Norwood	\$81.72	1,086	\$55,003	\$20,435	2
LWQYMOXA	Lowry City	\$83.23	1,403	\$73,178	\$27,187	2
LBLMOXA	Labelle	\$83.39	271	\$14,178	\$5,267	2
CSBYMOXA	Cosby	\$83.50	180	\$7,884	\$2,922	2
EWNGMOXA	Ewing	\$84.33	293	\$15,604	\$5,797	2
FLMRMOXA	Fillmore	\$85.67	265	\$14,468	\$5,375	2
TRNYMOXA	Turney	\$86.06	175	\$9,623	\$3,575	2
EVTNMOXA	Everton	\$87.10	614	\$34,401	\$12,781	2
KDDRMOXA	Kidder	\$89.08	438	\$25,407	\$9,439	2
ROBYMOXA	Roby	\$92.94	1,165	\$73,312	\$27,237	2
MILOMOXA	Milo	\$94.01	579	\$36,441	\$13,538	2
GORNMOXA	Gorin	\$94.65	172	\$10,935	\$4,063	2
CLNSMOXA	Collins	\$95.42	607	\$39,058	\$14,511	2
EGSPMOXA	Edgar Springs	\$99.10	1,058	\$71,837	\$26,686	2
KGTNMOXA	Kingston	\$99.99	535	\$36,871	\$13,888	2
WLKRMOXA	Walker	\$102.95	369	\$26,523	\$9,854	2
SHCYMOXA	Schell City	\$103.58	584	\$42,344	\$15,732	2
REVRMOXA	Revere	\$103.63	214	\$15,527	\$5,769	2
GVSPMOXA	Grovespring	\$104.03	667	\$48,662	\$18,079	2
EMERMOXA	Elmer	\$104.52	194	\$14,248	\$5,294	2
AVLLMOXA	Avilla	\$105.55	678	\$60,495	\$18,780	2
DDVLMOXA	Dadaville	\$105.55	474	\$36,776	\$13,292	2
BNGHMOXA	Bronaugh	\$107.28	459	\$34,970	\$12,982	2
BNKHMOXA	Bunker	\$115.20	748	\$82,759	\$23,317	2
ROSSMOXA	Boss	\$120.21	370	\$32,981	\$12,253	2
MNESMOXA	Manes	\$123.13	667	\$61,402	\$22,812	2
WHVLMOXA	Whitesville	\$123.28	194	\$17,888	\$6,646	2
ONVLMOXA	Oenterville	\$127.59	301	\$29,052	\$10,792	2
RKVLMOXA	Rockville	\$128.88	451	\$44,102	\$16,385	2
DLTNMOXA	Dalton	\$129.18	57	\$5,592	\$2,078	2
HNWLMOXA	Hunnewell	\$134.65	252	\$26,152	\$9,718	2
ARCLMOXA	Arcola	\$138.40	264	\$28,334	\$10,627	2
VNZNMOXA	Vanzant	\$138.60	553	\$59,462	\$22,092	2
OATSMOXA	Oates	\$140.89	441	\$48,429	\$17,993	2
MNTIMOX	Monticello	\$142.46	273	\$30,409	\$11,298	2
FRMTMOXA	Fremont	\$143.88	192	\$22,043	\$6,190	2
MNTKMOXA	Montauk	\$158.34	279	\$35,507	\$13,192	2
SNPFMOXA	Santa Fe	\$172.50	182	\$25,740	\$9,568	2
TMBRMOXA	Timber	\$205.89	192	\$33,565	\$12,470	2
STVLMOXA	Stutsville	\$261.67	181	\$37,128	\$13,793	2

Total \$60.14 130,851 \$3,796,242 \$1,411,147

					Loop Support Per Line	Switch Support Per Line
Zone 1	\$40.73	49,600	478,908	177,927	\$3.59	\$0.00
Zone 2	\$72.03	81,051	3,319,334	1,233,220	\$15.22	\$0.00

Spectra Communications
Study Area #: 421151

