

LAW OFFICES
BLOOSTON, MORDKOFKY, DICKENS, DUFFY & PRENDERGAST, LLP

BENJAMIN H. DICKENS, JR.
JOHN A. PRENDERGAST
GERARD J. DUFFY
RICHARD D. RUBINO
MARY J. SISAK
D. CARY MITCHELL
SALVATORE TAILLEFER, JR.

2120 L STREET, NW
WASHINGTON, DC 20037

(202) 659-0830
FACSIMILE: (202) 828-5568

April 17, 2019

ARTHUR BLOOSTON
1914 – 1999

AFFILIATED SOUTH AMERICAN OFFICES

ESTUDIO JAUREGUI & ASSOCIATES
BUENOS AIRES, ARGENTINA

HAROLD MORDKOFKY
OF COUNSEL

EUGENE MALISZEWSKYJ
ENGINEERING CONSULTANT

WRITER'S CONTACT INFORMATION

sta@bloostonlaw.com

202-828-5562

REDACTED – FOR PUBLIC INSPECTION

VIA HAND DELIVERY

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: South Dakota Network, LLC Tariff F.C.C. No. 1
WC Docket No. 18-100; Transmittal No. 13

Dear Ms. Dortch:

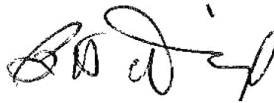
South Dakota Network, LLC (“SDN”), by its attorneys, hereby submits the attached Refund Plan in the above-referenced docket. Pursuant to the Protective Order adopted by the Commission in this proceeding,¹ SDN requests confidential treatment for certain information included therein which is commercially sensitive information that is not normally released to the public.

In accordance with the Protective Order and the Commission’s rules, one redacted copy has been filed via ECFS; one confidential, non-redacted copy has been submitted via hand delivery to the Secretary’s Office; and two confidential, non-redacted copies have been submitted via hand delivery to Mr. Christopher Koves.

¹ *In the Matter of South Dakota Network, LLC Tariff F.C.C. No. 1, PROTECTIVE ORDER*, WC Docket No. 18-100, et al., DA 18-1158, released November 14, 2018.

If you have any questions, please do not hesitate to contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "B. H. Dickens, Jr.", with a stylized flourish at the end.

Benjamin H. Dickens, Jr.

Mary J. Sisak

Salvatore Taillefer, Jr.

Counsel to South Dakota Network, LLC

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
July 1, 2018 Annual Access Charge Tariff Filings)	WC Docket No. 18-100
)	
South Dakota Network, LLC)	Transmittal No. 13
Tariff F.C.C. No. 1)	

REFUND PLAN OF SOUTH DAKOTA NETWORK, LLC

South Dakota Network, LLC (SDN), pursuant to the Commission's Memorandum Opinion and Order in the above-captioned proceeding, hereby submits its refund plan to implement the rate adjustment prescribed by the Commission.¹

In the Order, the Commission found that SDN must benchmark its tandem switched access rate to the CenturyLink tandem switched access rate contained in section 6.8.1 of CenturyLink's Tariff F.C.C. No. 11. The Commission found that SDN's rate should be calculated as the sum of the CenturyLink rate for Tandem Switching per minute of use (\$0.002252) plus Common Transport Multiplexing per minute of use (\$0.000036), for a total rate of \$0.002288. SDN revised its tariff to change its tandem switched access rate to the CenturyLink rate as calculated by the Commission. The new tariff rate became effective on April 5, 2019.

The Commission also directed the Wireline Competition Bureau to determine any refunds that may be required once the rates are effective. By this filing, SDN proposes to refund overcharges paid by affected carriers plus interest compounded daily, by issuing a credit on the invoice for affected carriers to be issued on May 1, 2019. SDN has calculated interest at the

¹ In the Matter of July 1, 2018 Annual Access Charge Tariff Filings, South Dakota Network, LLC Tariff F.C.C. No. 1, Memorandum Opinion and Order, FCC 19-15 (rel. March 1, 2019)

Internal Revenue Service non-corporate rate for overpayment and underpayment. This rate was 5% for the period October 2, 2018- December 31, 2018 and 6% from January 1, 2019 through June 2019.

To determine the overcharge for each carrier, SDN calculated the amount that should have been billed as of October 2, 2018 using the tariff rate that became effective on April 5, 2019 (\$0.002288 per minute) times the minutes of use for each carrier. SDN calculated the overcharge (credit) due as the difference between this recalculated amount and the amount billed by SDN.² SDN calculated the refund due as the difference between the credit due and the amount paid by the carrier.³ SDN calculated the interest due from the date the overcharge was paid through April 30, 2019. As stated, SDN intends to pay the refund plus interest to the affected carriers on May 1, 2019, by issuing a credit on the invoice. To determine the interest, SDN applied a rate of 5% for the period October 2, 2018 through December 31, 2018 and a rate of 6% from January 1, 2019 through April 30, 2019, compounded daily. SDN used the Excel calculation to determine interest compounded daily, which applies the formula: $FV = PV(1+r)^n$, where FV is future value, PV is present value, r is the interest rate per period, and n is the number of compounding periods.

The attached exhibit shows these calculations and the refund plus interest that will be credited to each affected carrier.

² On October 2, 2018, SDN's tariffed rate of \$0.004871 per minute became effective. However, due to an oversight, SDN failed to update its rate tables used for billing. Accordingly, SDN continued to bill a rate of \$0.005122 on October 2, 2018 until April 5, 2019 when its new tariff rate became effective. Accordingly, SDN has calculated the credit due as the difference between \$0.005122 and \$0.002288.

³ As shown in the attached exhibit, a number of carriers did not pay SDN's invoices or short-paid the invoices. SDN calculated the refund based on the amount paid.

SDN respectfully requests that the Commission approve the refund plans of SDN, as described herein, on an expedited basis.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "B.H. Dickens, Jr.", with a stylized flourish at the end.

Benjamin H. Dickens, Jr.
Mary J. Sisak

Counsel for South Dakota Network, LLC

CC: Lynne Engledow
Richard Kwiatkowski

REDACTED - FOR PUBLIC INSPECTION

CEA Switched Access Interstate Usage - Refund Calculations

No.	CompanyCode	12/31/2018											1/1/2019		4/30/2019	
		2018 Interest											5% 2019 Interest		6%	
		Company Name	Usage Year	Usage Month	INTERSTATE MinutesOfUse	Billed Amount (INTER) (a*.005122)	Payment Amount (INTER)	Payment Date	Balance Due (b+c)	INTERSTATE Amt Benchmark Rate (a*.002288)	Credit Due (f) (b)	Refund Due (g) (e)	Q4 2018 Interest - 5% compounded daily	Q1,2 2019 Interest - 6% compounded daily	Interest Due Customer (i+j)	
1			2018	10	42,698	\$ 218.70	(\$218.70)	11/26/18	\$0.00	\$ 97.69	\$ (121.01)	(\$121.01)	(\$0.58)	(\$2.40)	(\$2.98)	
2			2018	10	4,693,533	\$ 24,040.28	(\$24,040.28)	12/31/18	\$0.00	\$ 10,738.80	\$ (13,301.48)	(\$13,301.48)	\$0.00	(\$262.74)	(\$262.74)	
3			2018	10	467	\$ 2.39	(\$2.39)	11/27/18	\$0.00	\$ 1.07	\$ (1.32)	(\$1.32)	(\$0.01)	(\$0.03)	(\$0.03)	
4			2018	10	3,348	\$ 17.15	(\$17.15)	11/27/18	\$0.00	\$ 7.66	\$ (9.49)	(\$9.49)	(\$0.04)	(\$0.19)	(\$0.23)	
5			2018	10	1,278,215	\$ 6,547.02	(\$6,547.02)	11/20/18	\$0.00	\$ 2,924.56	\$ (3,622.46)	(\$3,622.46)	(\$20.40)	(\$71.96)	(\$92.36)	
6			2018	10	72,309	\$ 370.37	(\$370.37)	11/27/18	\$0.00	\$ 165.44	\$ (204.93)	(\$204.93)	(\$0.96)	(\$4.07)	(\$5.02)	
7			2018	10	1,153	\$ 5.91	(\$5.91)	11/27/18	\$0.00	\$ 2.64	\$ (3.27)	(\$3.27)	(\$0.02)	(\$0.06)	(\$0.08)	
8			2018	10	23,522	\$ 120.48	(\$56.23)	11/27/18	\$64.25	\$ 53.82	\$ (66.66)	(\$2.41)	(\$0.01)	(\$0.05)	(\$0.06)	
9			2018	10	1,492	\$ 7.64	(\$7.64)	11/27/18	\$0.00	\$ 3.41	\$ (4.23)	(\$4.23)	(\$0.02)	(\$0.08)	(\$0.10)	
10			2018	10	538,281	\$ 2,757.08	(\$967.03)	11/27/18	\$1,790.05	\$ 1,231.59	\$ (1,525.49)	\$0.00	\$0.00	\$0.00	\$0.00	
11			2018	10	330,557	\$ 1,693.11	(\$550.42)	11/27/18	\$1,142.69	\$ 756.31	\$ (936.80)	\$0.00	\$0.00	\$0.00	\$0.00	
12			2018	10	863,603	\$ 4,423.37	(\$1,975.91)	03/20/19	\$2,447.46	\$ 1,975.92	\$ (2,447.45)	\$0.00	\$0.00	\$0.00	\$0.00	
13			2018	10	1,545,107	\$ 7,914.04	(\$3,535.19)	03/20/19	\$4,378.85	\$ 3,535.20	\$ (4,378.84)	\$0.00	\$0.00	\$0.00	\$0.00	
14			2018	10	24,788	\$ 126.96	(\$56.71)	03/20/19	\$70.25	\$ 56.71	\$ (70.25)	\$0.00	\$0.00	\$0.00	\$0.00	
15			2018	10	6,028	\$ 30.88	(\$30.88)	02/08/19	\$0.00	\$ 13.79	\$ (17.09)	(\$17.09)		(\$0.23)	(\$0.23)	
16			2018	10	6,955	\$ 35.62	(\$35.62)	11/09/18	\$0.00	\$ 15.91	\$ (19.71)	(\$19.71)	(\$0.14)	(\$0.39)	(\$0.53)	
17			2018	10	21,765	\$ 111.48	(\$111.48)	11/30/18	\$0.00	\$ 49.80	\$ (61.68)	(\$61.68)	(\$0.26)	(\$1.22)	(\$1.49)	
18			2018	10	2	\$ 0.01	(\$0.01)	11/28/18	\$0.00	\$ 0.00	\$ (0.01)	(\$0.01)	(\$0.01)	(\$0.00)	(\$0.00)	
19			2018	10	1,465,178	\$ 7,504.64			\$7,504.64	\$ 3,352.33	\$ (4,152.31)	\$0.00	\$0.00	\$0.00	\$0.00	
20			2018	11	47,811	\$ 244.89	(\$244.89)	12/24/18	\$0.00	\$ 109.39	\$ (135.50)	(\$135.50)	(\$0.13)	(\$2.68)	(\$2.81)	
21			2018	11	4,500,513	\$ 23,051.63	(\$23,051.63)	01/29/19	\$0.00	\$ 10,297.17	\$ (12,754.46)	(\$12,754.46)		(\$192.21)	(\$192.21)	
22			2018	11	444	\$ 2.27	(\$2.27)	01/03/19	\$0.00	\$ 1.02	\$ (1.25)	(\$1.25)		(\$0.02)	(\$0.02)	
23			2018	11	2,695	\$ 13.80	(\$13.80)	01/03/19	\$0.00	\$ 6.17	\$ (7.63)	(\$7.63)		(\$0.15)	(\$0.15)	
24			2018	11	1,195,875	\$ 6,125.27	(\$6,125.27)	12/20/18	\$0.00	\$ 2,736.16	\$ (3,389.11)	(\$3,389.11)	(\$5.11)	(\$67.04)	(\$72.15)	
25			2018	11	66,643	\$ 341.35	(\$341.35)	01/03/19	\$0.00	\$ 152.48	\$ (188.87)	(\$188.87)		(\$3.67)	(\$3.67)	
26			2018	11	1,099	\$ 5.63	(\$5.63)	01/03/19	\$0.00	\$ 2.51	\$ (3.12)	(\$3.12)		(\$0.06)	(\$0.06)	
27			2018	11	22,048	\$ 112.93	(\$45.42)	01/03/19	\$67.51	\$ 50.45	\$ (62.48)	\$0.00		\$0.00	\$0.00	
28			2018	11	1,051	\$ 5.38	(\$5.38)	01/03/19	\$0.00	\$ 2.40	\$ (2.98)	(\$2.98)		(\$0.06)	(\$0.06)	
29			2018	11	413,089	\$ 2,115.84	(\$570.97)	01/03/19	\$1,544.87	\$ 945.15	\$ (1,170.69)	\$0.00	\$0.00	\$0.00	\$0.00	
30			2018	11	279,082	\$ 1,429.46			\$1,429.46	\$ 638.54	\$ (790.92)	\$0.00		\$0.00	\$0.00	
31			2018	11	894,387	\$ 4,581.05	(\$2,046.35)	03/20/19	\$2,534.70	\$ 2,046.36	\$ (2,534.69)	\$0.00		\$0.00	\$0.00	
32			2018	11	388	\$ 1.99	(\$1.99)	12/28/18	\$0.00	\$ 0.89	\$ (1.10)	(\$1.10)	(\$0.00)	(\$0.02)	(\$0.02)	
33			2018	11	1,345,892	\$ 6,893.66	(\$6,893.66)	12/28/18	\$0.00	\$ 3,079.40	\$ (3,814.26)	(\$3,814.26)	(\$1.57)	(\$75.37)	(\$76.94)	
34			2018	11	27,712	\$ 141.94	(\$63.40)	03/20/19	\$78.54	\$ 63.41	\$ (78.53)	\$0.00		\$0.00	\$0.00	
35			2018	11	5,474	\$ 28.04			\$28.04	\$ 12.52	\$ (15.52)	\$0.00		\$0.00	\$0.00	
36			2018	11	6,879	\$ 35.23	(\$35.23)	12/10/18	\$0.00	\$ 15.74	\$ (19.49)	(\$19.49)	(\$0.06)	(\$0.39)	(\$0.44)	
37			2018	11	16,774	\$ 85.92	(\$85.92)	12/21/18	\$0.00	\$ 38.38	\$ (47.54)	(\$47.54)	(\$0.07)	(\$0.94)	(\$1.01)	
38			2018	11	0	\$ -			\$0.00	\$ -	\$ -	\$0.00		\$0.00	\$0.00	
39			2018	11	1,515,386	\$ 7,761.81			\$7,761.81	\$ 3,467.20	\$ (4,294.61)	\$0.00		\$0.00	\$0.00	
40			2018	12	30,664	\$ 157.06	(\$157.06)	01/28/19	\$0.00	\$ 70.16	\$ (86.90)	(\$86.90)		(\$1.32)	(\$1.32)	
41			2018	12	4,148,447	\$ 21,248.35	(\$21,248.35)	02/28/19	\$0.00	\$ 9,491.65	\$ (11,756.70)	(\$11,756.70)		(\$118.47)	(\$118.47)	
42			2018	12	646	\$ 3.31	(\$3.31)	01/24/19	\$0.00	\$ 1.48	\$ (1.83)	(\$1.83)		(\$0.03)	(\$0.03)	
43			2018	12	1,618	\$ 8.29	(\$8.29)	01/24/19	\$0.00	\$ 3.70	\$ (4.59)	(\$4.59)		(\$0.07)	(\$0.07)	
44			2018	12	1,181,050	\$ 6,049.34	(\$6,049.34)	01/18/19	\$0.00	\$ 2,702.24	\$ (3,347.10)	(\$3,347.10)		(\$56.59)	(\$56.59)	
45			2018	12	60,657	\$ 310.69	(\$310.69)	01/24/19	\$0.00	\$ 138.78	\$ (171.91)	(\$171.91)		(\$2.73)	(\$2.73)	
46			2018	12	916	\$ 4.69	(\$4.69)	01/24/19	\$0.00	\$ 2.10	\$ (2.59)	(\$2.59)		(\$0.04)	(\$0.04)	
47			2018	12	15,491	\$ 79.34	(\$10.84)	01/24/19	\$68.50	\$ 35.44	\$ (43.90)	\$0.00		\$0.00	\$0.00	
48			2018	12	1,051	\$ 5.38	(\$5.38)	01/24/19	\$0.00	\$ 2.40	\$ (2.98)	(\$2.98)		(\$0.05)	(\$0.05)	
49			2018	12	342,830	\$ 1,755.98	(\$208.17)	01/24/19	\$1,547.81	\$ 784.40	\$ (971.58)	\$0.00		\$0.00	\$0.00	
50			2018	12	466,797	\$ 2,390.93	(\$768.38)	01/24/19	\$1,622.55	\$ 1,068.03	\$ (1,322.90)	\$0.00		\$0.00	\$0.00	
51			2018	12	843,349	\$ 4,319.63	(\$4,319.63)	02/07/19	\$0.00	\$ 1,929.58	\$ (2,390.05)	(\$2,390.05)		(\$32.43)	(\$32.43)	
52			2018	12	1,148,234	\$ 5,881.25	(\$2,627.14)	03/20/19	\$3,254.11	\$ 2,627.16	\$ (3,254.09)	\$0.00		\$0.00	\$0.00	
53			2018	12	32,843	\$ 168.22	(\$75.14)	03/20/19	\$93.08	\$ 75.14	\$ (93.08)	\$0.00		\$0.00	\$0.00	
54			2018	12	4,282	\$ 21.93			\$21.93	\$ 9.80	\$ (12.13)	\$0.00		\$0.00	\$0.00	
55			2018	12	6,409	\$ 32.83	(\$32.83)	01/10/19	\$0.00	\$ 14.66	\$ (18.17)	(\$18.17)		(\$0.33)	(\$0.33)	
56			2018	12	16,430	\$ 84.15	(\$84.15)	01/30/19	\$0.00	\$ 37.59	\$ (46.56)	(\$46.56)		(\$0.69)	(\$0.69)	
57			2018	12	0	\$ -			\$0.00	\$ -	\$ -	\$0.00		\$0.00	\$0.00	

REDACTED - FOR PUBLIC INSPECTION

REDACTED - FOR PUBLIC INSPECTION

58		2018	12	1,324,538	\$	6,784.28	(\$6,784.28)	01/28/19	\$0.00	\$	3,030.54	\$	(3,753.74)	(\$3,753.74)	(\$57.20)	(\$57.20)
59		2019	1	14,295	\$	73.22	(\$73.22)	02/25/19	\$0.00	\$	32.71	\$	(40.51)	(\$40.51)	(\$0.43)	(\$0.43)
60		2019	1	5,167,804	\$	26,469.49	(\$26,469.49)	04/02/19	\$0.00	\$	11,823.94	\$	(14,645.55)	(\$14,645.55)	(\$67.56)	(\$67.56)
61		2019	1	521	\$	2.67	(\$2.67)	02/28/19	\$0.00	\$	1.19	\$	(1.48)	(\$1.48)	(\$0.01)	(\$0.01)
62		2019	1	2,136	\$	10.94	(\$10.94)	02/28/19	\$0.00	\$	4.89	\$	(6.05)	(\$6.05)	(\$0.06)	(\$0.06)
63		2019	1	1,260,034	\$	6,453.89	(\$6,453.89)	02/28/19	\$0.00	\$	2,882.96	\$	(3,570.93)	(\$3,570.93)	(\$35.98)	(\$35.98)
64		2019	1	60,183	\$	308.26	(\$308.26)	02/28/19	\$0.00	\$	137.70	\$	(170.56)	(\$170.56)	(\$1.72)	(\$1.72)
65		2019	1	143,446	\$	734.73	(\$734.73)	03/01/19	\$0.00	\$	328.20	\$	(406.53)	(\$406.53)	(\$4.03)	(\$4.03)
66		2019	1	1,302	\$	6.67	(\$6.67)	02/28/19	\$0.00	\$	2.98	\$	(3.69)	(\$3.69)	(\$0.04)	(\$0.04)
67		2019	1	22,465	\$	115.07	(\$70.62)	02/28/19	\$44.45	\$	51.40	\$	(63.67)	(\$19.22)	(\$0.19)	(\$0.19)
68		2019	1	928	\$	4.75	(\$4.75)	02/28/19	\$0.00	\$	2.12	\$	(2.63)	(\$2.63)	(\$0.03)	(\$0.03)
69		2019	1	404,983	\$	2,074.32	(\$1,090.39)	02/28/19	\$983.93	\$	926.60	\$	(1,147.72)	(\$163.79)	(\$1.65)	(\$1.65)
70		2019	1	396,082	\$	2,028.73			\$2,028.73	\$	906.24	\$	(1,122.49)	\$0.00	\$0.00	\$0.00
71		2019	1	807,958	\$	4,138.36	(\$1,848.59)	03/20/19	\$2,289.77	\$	1,848.61	\$	(2,289.75)	\$0.00	\$0.00	\$0.00
72		2019	1	1,239,979	\$	6,351.17	(\$2,837.06)	03/20/19	\$3,514.11	\$	2,837.07	\$	(3,514.10)	\$0.00	\$0.00	\$0.00
73		2019	1	31,662	\$	162.17	(\$72.44)	03/20/19	\$89.73	\$	72.44	\$	(89.73)	\$0.00	\$0.00	\$0.00
74		2019	1	6,837	\$	35.02			\$35.02	\$	15.64	\$	(19.38)	\$0.00	\$0.00	\$0.00
75		2019	1	6,802	\$	34.84	(\$34.84)	02/07/19	\$0.00	\$	15.56	\$	(19.28)	(\$19.28)	(\$0.26)	(\$0.26)
76		2019	1	11,699	\$	59.92	(\$59.92)	03/01/19	\$0.00	\$	26.77	\$	(33.15)	(\$33.15)	(\$0.33)	(\$0.33)
77		2019	1	19,044	\$	97.54	(\$97.54)	03/01/19	\$0.00	\$	43.57	\$	(53.97)	(\$53.97)	(\$0.53)	(\$0.53)
78		2019	1	3	\$	0.02	(\$0.02)	03/01/19	\$0.00	\$	0.01	\$	(0.01)	(\$0.01)	(\$0.00)	(\$0.00)
79		2019	1	1,442,807	\$	7,390.06			\$7,390.06	\$	3,301.14	\$	(4,088.92)	\$0.00	\$0.00	\$0.00
80		2019	2	21,034	\$	107.74	(\$107.73)	03/25/19	\$0.01	\$	48.13	\$	(59.61)	(\$59.60)	(\$0.35)	(\$0.35)
81		2019	2	4,729,860	\$	24,226.34			\$24,226.34	\$	10,821.92	\$	(13,404.42)	\$0.00	\$0.00	\$0.00
82		2019	2	354	\$	1.81	(\$1.81)	03/15/19	\$0.00	\$	0.81	\$	(1.00)	(\$1.00)	(\$0.01)	(\$0.01)
83		2019	2	1,685	\$	8.63	(\$8.63)	03/15/19	\$0.00	\$	3.86	\$	(4.77)	(\$4.77)	(\$0.04)	(\$0.04)
84		2019	2	1,111,146	\$	5,691.29	(\$5,691.29)	03/20/19	\$0.00	\$	2,542.30	\$	(3,148.99)	(\$3,148.99)	(\$21.29)	(\$21.29)
85		2019	2	55,293	\$	283.21	(\$110.48)	03/18/19	\$172.73	\$	126.51	\$	(156.70)	\$0.00	\$0.00	\$0.00
86		2019	2	256,999	\$	1,316.35	(\$1,316.35)	03/29/19	\$0.00	\$	588.01	\$	(728.34)	(\$728.34)	(\$3.84)	(\$3.84)
87		2019	2	1,010	\$	5.17	(\$5.17)	03/15/19	\$0.00	\$	2.31	\$	(2.86)	(\$2.86)	(\$0.02)	(\$0.02)
88		2019	2	22,905	\$	117.32	(\$52.84)	03/15/19	\$64.48	\$	52.41	\$	(64.91)	(\$0.43)	(\$0.00)	(\$0.00)
89		2019	2	935	\$	4.79	(\$4.79)	03/15/19	\$0.00	\$	2.14	\$	(2.65)	(\$2.65)	(\$0.02)	(\$0.02)
90		2019	2	354,760	\$	1,817.08	(\$654.78)	03/18/19	\$1,162.30	\$	811.69	\$	(1,005.39)	\$0.00	\$0.00	\$0.00
91		2019	2	189,834	\$	972.33			\$972.33	\$	434.34	\$	(537.99)	\$0.00	\$0.00	\$0.00
92		2019	2	663,657	\$	3,399.25	(\$249.06)	04/03/19	\$3,150.19	\$	1,518.45	\$	(1,880.80)	\$0.00	\$0.00	\$0.00
93		2019	2	480	\$	2.46	(\$2.46)	04/03/19	\$0.00	\$	1.10	\$	(1.36)	(\$1.36)	(\$0.01)	(\$0.01)
94		2019	2	1,302,924	\$	6,673.58	(\$180.84)	04/03/19	\$6,492.74	\$	2,981.09	\$	(3,692.49)	\$0.00	\$0.00	\$0.00
95		2019	2	27,145	\$	139.04	(\$34.23)	04/03/19	\$104.81	\$	62.11	\$	(76.93)	\$0.00	\$0.00	\$0.00
96		2019	2	4,537	\$	23.24			\$23.24	\$	10.38	\$	(12.86)	\$0.00	\$0.00	\$0.00
97		2019	2	6,767	\$	34.66	(\$34.66)	03/08/19	\$0.00	\$	15.48	\$	(19.18)	(\$19.18)	(\$0.17)	(\$0.17)
98		2019	2	18,007	\$	92.23	(\$92.23)	03/29/19	\$0.00	\$	41.20	\$	(51.03)	(\$51.03)	(\$0.27)	(\$0.27)
99		2019	2	100,747	\$	516.03	(\$516.03)	03/29/19	\$0.00	\$	230.51	\$	(285.52)	(\$285.52)	(\$1.51)	(\$1.51)
100		2019	2	0	\$	-			\$0.00	\$	-	\$	-	\$0.00	\$0.00	\$0.00
101		2019	2	1,315,949	\$	6,740.29			\$6,740.29	\$	3,010.89	\$	(3,729.40)	\$0.00	\$0.00	\$0.00
102		2019	3	28,948	\$	148.27			\$148.27	\$	66.23	\$	(82.04)	\$0.00	\$0.00	\$0.00
103		2019	3	4,904,710	\$	25,121.92			\$25,121.92	\$	11,221.98	\$	(13,899.94)	\$0.00	\$0.00	\$0.00
104		2019	3	488	\$	2.50	(\$2.50)	04/05/19	\$0.00	\$	1.12	\$	(1.38)	(\$1.38)	(\$0.01)	(\$0.01)
105		2019	3	1,825	\$	9.35	(\$9.35)	04/05/19	\$0.00	\$	4.18	\$	(5.17)	(\$5.17)	(\$0.02)	(\$0.02)
106		2019	3	1,234,398	\$	6,322.59			\$6,322.59	\$	2,824.30	\$	(3,498.29)	\$0.00	\$0.00	\$0.00
107		2019	3	62,525	\$	320.25	(\$320.25)	04/05/19	\$0.00	\$	143.06	\$	(177.19)	(\$177.19)	(\$0.73)	(\$0.73)
108		2019	3	298,618	\$	1,529.52			\$1,529.52	\$	683.24	\$	(846.28)	\$0.00	\$0.00	\$0.00
109		2019	3	1,596	\$	8.17	(\$8.17)	04/05/19	\$0.00	\$	3.65	\$	(4.52)	(\$4.52)	(\$0.02)	(\$0.02)
110		2019	3	26,392	\$	135.18			\$135.18	\$	60.38	\$	(74.80)	\$0.00	\$0.00	\$0.00
111		2019	3	801	\$	4.10	(\$4.10)	04/05/19	\$0.00	\$	1.83	\$	(2.27)	(\$2.27)	(\$0.01)	(\$0.01)
112		2019	3	390,951	\$	2,002.45	(\$2,002.45)	04/05/19	\$0.00	\$	894.50	\$	(1,107.95)	(\$1,107.95)	(\$4.56)	(\$4.56)
113		2019	3	243,230	\$	1,245.82			\$1,245.82	\$	556.51	\$	(689.31)	\$0.00	\$0.00	\$0.00
114		2019	3	649,940	\$	3,328.99			\$3,328.99	\$	1,487.06	\$	(1,841.93)	\$0.00	\$0.00	\$0.00
115		2019	3	276	\$	1.41			\$1.41	\$	0.63	\$	(0.78)	\$0.00	\$0.00	\$0.00
116		2019	3	1,265,871	\$	6,483.79			\$6,483.79	\$	2,896.31	\$	(3,587.48)	\$0.00	\$0.00	\$0.00
117		2019	3	31,701	\$	162.37			\$162.37	\$	72.53	\$	(89.84)	\$0.00	\$0.00	\$0.00
118		2019	3	4,867	\$	24.93			\$24.93	\$	11.14	\$	(13.79)	\$0.00	\$0.00	\$0.00
119		2019	3	7,960	\$	40.77			\$40.77	\$	18.21	\$	(22.56)	\$0.00	\$0.00	\$0.00
120		2019	3	15,623	\$	80.02			\$80.02	\$	35.75	\$	(44.27)	\$0.00	\$0.00	\$0.00
121		2019	3	362,181	\$	1,855.09			\$1,855.09	\$	828.67	\$	(1,026.42)	\$0.00	\$0.00	\$0.00

REDACTED - FOR PUBLIC INSPECTION

REDACTED - FOR PUBLIC INSPECTION

122		2019	3	0	\$	-		\$0.00	\$	-	\$	-	\$0.00		\$0.00	\$0.00
123		2019	3	1,346,453	\$	6,896.53		\$6,896.53	\$	3,080.68	\$	(3,815.85)	\$0.00		\$0.00	\$0.00
				62,994,847	\$	322,659.57	(\$172,346.01)	\$150,313.56	\$	144,132.21	\$	(178,527.36)	(\$84,059.07)	(\$29.37)	(\$1,101.70)	(\$1,131.07)