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JUL 12 1994

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matters of)	
)	
Petition for Relief from Unjust)	
and Unreasonable Discrimination)	
in the Deployment of Video)	
Dialtone Facilities)	DA 94-621
)	
Petition for Rulemaking to Adapt)	
the Section 214 Process to the)	RM-8491
Construction of Video Dialtone)	
Facilities)	

COMMENTS

U S WEST Communications, Inc. ("U S WEST"), through counsel and pursuant to the Federal Communications Commission's ("Commission") Public Notice,¹ hereby files the attached Oppositions to the Petition for Relief and the Petition for Rulemaking filed jointly by the Center for Media Education, Consumer Federation of America, the Office of Communication of the United Church of Christ, the National Association for the Advancement of Colored People, and the National Council of La Raza ("Joint Petitioners"). U S WEST's Oppositions were previously filed on June 2, 1994, in accordance with Sections 1.45(a) and 1.405(a) of the Commission's Rules² prior to the release of the Commission's Public Notice requesting comment on Joint Petitioners' "redlin-

¹Public Notice, Pleading Cycle Established for Comments on Petition for Rulemaking and Petition for Relief in Section 214 Video Dialtone Application Process, DA 94-621, rel. June 13, 1994; see also In the Matter of Petition for Rulemaking and Petition for Relief in Section 214 Video Dialtone Application Process, Order, DA 94-704, rel. June 24, 1994.

²47 CFR §§ 1.45(a), 1.405(a).

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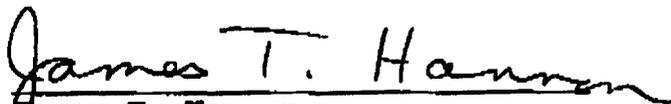
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"redlining" allegations. U S WEST is refiling these Oppositions in accordance with the Commission's Public Notice to ensure that they are considered and included in the record of the above-captioned proceeding.

Respectfully submitted,

U S WEST COMMUNICATIONS, INC.

By:



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Its Attorney

Of Counsel,
Laurie J. Bennett

July 12, 1994

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In the Matter of)
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OPPOSITION

U S WEST Communications, Inc. ("U S WEST"), through counsel and pursuant to Section 1.45(a) of the Federal Communications Commission's ("Commission") Rules,¹ hereby files its Opposition to the above-captioned Petition for Relief filed on May 23, 1994 ("Joint Petition"), by the Center for Media Education, the Consumer Federation of America, the Office of Communication of the United Church of Christ, the National Association for the Advancement of Colored People and the National Council of La Raza ("Joint Petitioners").

I. INTRODUCTION

Joint Petitioners' claims in regard to U S WEST's Section 214 Applications for video dialtone (or "VDT") are based on a study conducted by Dr. Mark N. Cooper which is summarized in his affidavit. According to Joint Petitioners, Dr. Cooper "found a clear and systematic pattern of not serving low income and minority areas" in the Section 214 Applications of U S WEST and other local exchange carriers ("LEC").² U S WEST vehemently

¹47 CFR § 1.45(a).

²Joint Petition at ii.

disagrees with this conclusion. Not only is it false, but an examination of U.S. Census data indicates exactly the opposite. That is, U S WEST's Section 214 Applications to construct and operate VDT facilities in Denver, Minneapolis-St. Paul and Portland³ cover a cross-section of income groups and a racially/ethnically diverse population.

After unjustly accusing U S WEST of unreasonable discrimination in violation of Section 202(a) of the Communications Act,⁴ Joint Petitioners ask for the following relief:

1. They ask the Commission to "formally announce its commitment to the goal of universal video dialtone service, and to nondiscriminatory deployment at each phase of its construction."⁵
2. They ask the Commission to "issue an interpretive rule clarifying that, under 47 U.S.C. § 202(a) and 47 U.S.C. § 214, any proposed video dialtone facility must serve the public on a nondiscriminatory basis. The rule should advise applicants to include evidence enabling the Commission to make a reasoned determination that the planned deployment will not discriminate on the basis of income level, race, or ethnicity."⁶
3. They ask the Commission to "issue an internal procedural rule establishing guidelines for its staff in handling video dialtone § 214 applications. . . . The Commission should . . . direct its staff to review

³Section 214 Applications were filed by U S WEST on Jan. 10, 1994, for the Denver, Colorado, service area (File No. W-P-C-6919) ("Denver Application") and on Jan. 19, 1994, for the Portland, Oregon, service area (File No. W-P-C-6921) and the Minneapolis-St. Paul, Minnesota, service area (File No. W-P-C-6922).

⁴47 USC § 202(a).

⁵Joint Petition at 14.

⁶Id. at 15.

each application to determine whether the proposed service redlines an economic class, race, or ethnic group."⁷

Joint Petitioners are not asking for relief; they are asking the Commission to modify its rules and, to a certain extent, to modify the Communications Act.⁸ The Commission can do neither in this proceeding. Joint Petitioners have yet to be harmed. Even if Joint Petitioners' claims were true -- which they are not with respect to U S WEST -- no harm would occur until the Commission granted the Section 214 Applications which are the subject of the Joint Petition. In essence, the Joint Petition is a late-filed Petition to Deny LEC Section 214 Applications to construct and operate VDT facilities. The only relief the Commission could grant Joint Petitioners, if it chose to accept this late-filed petition, would be to find that one or more of the Section 214 Applications does not serve the public interest and to deny any such Applications.

If discrimination has occurred -- which it has not in U S WEST's case -- the Commission has sufficient authority under Section 202 of the Act to remedy the problem.⁹ Section 202 not only contains specific language prohibiting unjust or unreasonable discrimination in virtually all aspects of

⁷Id. at 16.

⁸Joint Petitioners ask that the Commission take similar action in their Petition for Rulemaking which was also filed on May 23, 1994.

⁹47 USC § 202.

provisioning communications services,¹⁰ it also contains monetary penalties for violations.¹¹ The key question in any Section 202 determination is: do the facts support a finding of prejudicial or discriminatory conduct? The answer is no with respect to U S WEST's Section 214 Applications, as discussed in Section II. Accordingly, no action is merited on Joint Petitioners' allegation with respect to U S WEST's Applications.

Other than a possible finding that a LEC Section 214 application is "inconsistent with the public interest," the Commission should not take any action on Joint Petitioners' Petition for Relief. The proper vehicle for addressing most of Joint Petitioners' requests would be a rulemaking. Requests that the Commission modify its rules governing the content of and the standards for approving Section 214 applications can be addressed only in a rulemaking proceeding. Joint Petitioners have not made a convincing case that an industry-wide problem exists that would warrant initiation of a rulemaking proceeding to promulgate "red-

¹⁰Section 202(a) reads as follows:

It shall be unlawful for any common carrier to make any unjust or unreasonable discrimination in charges, practices, classifications, regulations, facilities, or services for or in connection with like communication service, directly or indirectly, by any means or device, or to make or give any undue or unreasonable preference or advantage to any particular person, class of persons, or locality, or to subject any particular person, class of persons, or locality to any undue or unreasonable prejudice or disadvantage.

47 USC § 202(a).

¹¹See 47 USC § 202(c).

lining" rules for Section 214 applications for video dialtone service.

As to the matter of whether video dialtone service should be included in the "definition" of universal service, as Joint Petitioners appear to suggest, there are a host of issues that must be addressed before such a commitment can be made. Clearly, the VDT Section 214 process is not the appropriate place to address the issue of universal service.¹²

In the Section which follows, U S WEST addresses Joint Petitioners' allegation that U S WEST has engaged in red-lining low-income and minority groups in selecting wire centers for inclusion in Section 214 applications for VDT service. U S WEST presents evidence that demonstrates that Joint Petitioners' red-lining allegation cannot be substantiated with respect to U S WEST's Applications.¹³ U S WEST requests that the Commission find that its Section 214 Applications are consistent with the public interest as to the selection of areas to be served by U S WEST's proposed VDT facilities.

¹²In its Comments in the Price Cap Review, U S WEST urged the Commission to open a separate proceeding to review the scope of universal service and the funding mechanisms and subsidies in place to support universal service. In the Matter of Price Cap Performance Review for Local Exchange Carriers, CC Docket No. 94-1, U S WEST's Comments filed May 9, 1994, at 68-69. It would be unwise to address this issue within the context of Section 214 applications for VDT. Also see USTA AND UNIVERSAL SERVICE: Meeting Customer Requirements into the 21st Century, April 1994.

¹³U S WEST is not familiar with and has no opinion on the Section 214 Applications of other LECs. This Opposition is restricted to responding to Joint Petitioners' specific allegations against U S WEST.

II. JOINT PETITIONERS' ALLEGATION THAT U S WEST ENGAGED IN RED-LINING IS PATENTLY FALSE

Joint Petitioners assert that U S WEST has engaged in "red-lining" low-income and minority neighborhoods in selecting areas (i.e., wire centers) to be included in its Section 214 Applications to provide VDT service. Joint Petitioners are wrong. Their claim is based on a study by Dr. Mark Cooper and his supporting affidavit. Dr. Cooper's study is at best haphazard and of questionable validity. His study can more aptly be described as "a preconceived conclusion seeking a methodology to support it." He claims to have used median household income data by wire center which was submitted by U S WEST in an earlier Opposition¹⁴ and U.S. Census data to arrive at his results. This may or may not be true -- U S WEST has not attempted to replicate Dr. Cooper's study.¹⁵ As U S WEST demonstrates, neither Dr. Cooper's conclusions nor Joint Petitioners' claim of red-lining low-income and minority households can be substantiated by an examination of disaggregated demographic data. Joint Petitioners' claim should be rejected as meritless.

¹⁴In the Matter of the Applications of U S WEST Communications, Inc., for Authority Under Section 214 of the Communications Act of 1934, as Amended, to Construct, Operate, Own and Maintain Facilities and Equipment to Provide Video Dialtone Service in Portions of the Portland, Oregon, Service Area; the Minneapolis-St. Paul, Minnesota, Service Area; and the Denver, Colorado, Service Area, File Nos. W-P-C-6919, W-P-C-6921 and W-P-C-6922, U S WEST's Opposition filed Mar. 17, 1994.

¹⁵There is little resemblance between the income data previously submitted by U S WEST and Dr. Cooper's summary data.

In her attached Affidavit, Susan A. Portwood, Director - Product Development, Broadband and Multimedia Services, U S WEST Communications, Inc., presents detailed income and racial/ethnic data for U S WEST's wire centers in Denver, Minneapolis-St. Paul and Portland. As Ms. Portwood points out, this data speaks for itself, and little, if any, analysis is required to conclude that Joint Petitioners' allegation finds no support in the data. In addition to providing wire center data, Ms. Portwood has summarized the data for those wire centers included in U S WEST's VDT Applications and those excluded. This summary data provides no support for Joint Petitioners' allegation. In fact, it points to exactly the opposite conclusion -- that U S WEST's Section 214 Applications cover a cross-section of different income levels and a racially/ethnically diverse population. For example, the household median income for the wire centers included in U S WEST's Denver Application is \$37,991 versus \$40,106 for other wire centers in the Denver area. Similar observations hold true for race/ethnic characteristics of the wire centers covered by the Denver Application. These wire centers have a population which is 5.98 percent Black and 13.88 percent Hispanic, compared to a population which is 5.32 percent Black and 11.29 percent Hispanic for wire centers not included in the Denver Application.

Ms. Portwood also acknowledges that U S WEST excluded wire centers in the centers of Denver, Minneapolis-St. Paul and Portland from its VDT deployment plans for 1995-96. She notes that these wire centers are dominated by office buildings and primarily serve business customers.

Ms. Portwood explains that U S WEST derived the attached detailed demographic data by wire center using commercially available geographic information system software. U S WEST's only inputs into the system were its wire center boundaries. Thus, any party using the same geographic boundaries could duplicate U S WEST wire center data.

III. CONCLUSION

As the foregoing demonstrates, there is no basis for Joint Petitioners' "red-lining" claim with respect to U S WEST's Section 214 Applications. The Commission should find that U S WEST's Applications are consistent with the public interest and dismiss Joint Petitioners' Petition for Relief.

Respectfully submitted,

U S WEST COMMUNICATIONS, INC.

By: James T. Hannon
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Suite 700
1020 19th Street, N.W.
Washington, DC 20036
(303) 672-2860

Its Attorney

Of Counsel,
Laurie J. Bennett

June 2, 1994

Attachment

STATE OF COLORADO)
) ss.
CITY AND COUNTY OF DENVER)

AFFIDAVIT

I, Susan A. Portwood, first being duly sworn, hereby state that the following information is true and correct to the best of my knowledge, information and belief:

1. I am an employee of U S WEST Communications, Inc. My title is Director - Product Development, Broadband and Multimedia Services. My business address is 1999 Broadway, Suite 2800, Denver, Colorado 80202.
2. In my capacity as Director of Product Development, I am responsible for the design, pricing and deployment of U S WEST's basic video dialtone platform.
3. As Director of Product Development, I was involved in recommending and selecting those portions of the Denver, Colorado, Minneapolis-St. Paul, Minnesota, and Portland, Oregon, service areas covered by U S WEST's Section 214 Applications.
4. I have examined the Petition for Relief and the Petition for Rulemaking filed jointly by the Center for Media Education, Consumer Federation of America, the Office of Communication of the United Church of Christ, the National Association for the Advancement of Colored People and the National Council of La Raza ("Joint Petitioners"). I have also examined the affidavit of Dr. Mark N. Cooper which was filed in support of the Petition for Relief. Joint Petitioners claim that U S WEST's Section 214 Applications contain a "clear and systematic pattern of not serving low-income and minority areas" in Denver, Minneapolis-St. Paul and Portland. This allegation of "electronic red-lining" is patently false and is not supported by the facts.
5. I have previously responded to similar allegations raised by the Center for Media Education and the Consumer Federation of America ("CME") in their Petition to Deny U S WEST's Section 214 Applications to construct and operate video dialtone facilities in Denver, Minneapolis-St. Paul and Portland. In that petition, CME claimed that U S WEST would engage in "red-lining" low-income areas by building video dialtone facilities only in the wealthiest areas. The issue

of racial/ethnic "red-lining" was never raised. In refuting CME's claims, U S WEST provided median household income data by wire center. This data conclusively demonstrated that U S WEST's Section 214 Applications covered a cross-section of different household income levels.

6. The current petitions of Joint Petitioners represent an extension of CME's earlier claim to include racial/ethnic "red-lining." As with CME's earlier claim, this expanded "red-lining" allegation cannot be substantiated by the facts. U S WEST did not consider racial/ethnic characteristics in selecting the wire centers in which it proposes to deploy video dialtone service. Racial/ethnic data was collected later and only in order to respond to Petitioners' allegations. The attached U.S. Census data by wire center demonstrate that there is no basis for Joint Petitioners' allegations with respect to U S WEST's Section 214 Applications.

7. I have attached my earlier affidavit rather than repeat my explanation of the factors that U S WEST used in selecting the wire centers in Denver, Minneapolis-St. Paul and Portland to deploy video dialtone service during the 1995-96 timeframe.

8. A few comments on Dr. Cooper's affidavit are in order given the serious nature of Joint Petitioners' allegations. I can only describe Dr. Cooper's research methods as crude and his conclusions as unsupported. For example, Dr. Cooper's use of "a median of medians" concept to calculate income data is unnecessary and produces highly inaccurate results. Sophisticated geographic information system software is available to map census data to geographic areas, as Anthony L. Pharr notes in his affidavit. One cannot help but ask if Dr. Cooper did not begin his research with a set of preconceived conclusions and set out to "prove" them, regardless of the facts. I am confident that when the Commission examines the attached demographic data by wire center it will reject Dr. Cooper's conclusions.

9. The attached demographic data for wire centers in the Denver, Minneapolis-St. Paul and Portland exchanges demonstrate that there is no factual basis for Joint Petitioners' "red-lining" claims. This data speaks for itself -- little, if any, analysis is required to conclude that Joint Petitioners are wrong in their assertion that U S WEST is engaging in "red-lining." This data can be summarized as follows:

	Household Median Income <u>(1994 Est.)</u>	Population by Race & Black <u>(1994 Est.)</u>	Population & Hispanic <u>(1994 Est.)</u>
<u>Denver</u>			
VDT Wire Centers (proposed)	\$37,991	5.98%	13.88%
Non-VDT Wire Centers	\$40,106	5.32%	11.29%
All Wire Centers	\$39,132	5.61%	12.44%

Minneapolis-St. Paul

VDT Wire Centers (proposed)	\$39,561	6.97%	2.08%
Non-VDT Wire Centers	\$45,004	3.34%	1.68%
All Wire Centers	\$42,296	4.69%	1.83%

Portland

VDT Wire Centers (proposed)	\$33,441	6.85%	3.14%
Non-VDT Wire Centers	\$35,197	3.19%	2.98%
All Wire Centers	\$34,443	4.63%	3.04%

This data demonstrate that U S WEST's Section 214 Applications cover a cross-section of different income levels and a racially/ethnically diverse population.

- It should come as no surprise that U S WEST has not included wire centers in the core of the city (i.e., downtown wire centers) in its video dialtone deployment plans for 1995-96. These wire centers are dominated by office buildings and primarily serve businesses, not residential customers.

11. The above summary data and the attached detailed demographic data by wire center were derived using commercially available geographic information system ("GIS") software. This allowed U S WEST to map U.S. Census data and other economic data to wire center boundaries. U S WEST's only inputs into the system were its wire center boundaries. Also included in the enclosed attachment is summary data for Metropolitan Statistical Areas ("MSA"). It should be noted that U S WEST's wire center boundaries do not necessarily coincide with any given political jurisdiction (e.g., City and County of Denver). In no case do U S WEST's local exchange boundaries (i.e., total of all wire centers) coincide with MSA boundaries.
12. The attached demographic data demonstrate that U S WEST's video dialtone wire center selection process, which was based on sound business criteria, has not resulted in the exclusion of low-income and minority groups.

Susan A. Portwood
Susan A. Portwood

Subscribed and sworn to before me this 1st day of June, 1994, by Susan A. Portwood.

WITNESS my hand and official seal.

Maaja Beck
Notary Public

My Commission Expires: May 8, 1996

Demographic Profile Report by MSA/Wire Center

Denver

Page 1 of 2

Wire Center	Household Total (1994 Est.)	Household Median Income (1994 Est.)	Population Total (1994 Est.)	Population by Race by Race White (1994)	Population by Race by Race % White (1994)	Population by Race by Race Black (1994)	Population by Race by Race % Black (1994)	Population by Race Asian, Pac Isld (1994)	Population by Race % Asian, Pac Isld (1994)	Population by Race Am Indian, Other (1994)	Population by Race % Am Indian, Other (1994)	Population Hispanic (1994)	Population % Hispanic (1994)
ABERDEEN	2,780	\$62,267	8,865	8,456	95.38%	169	1.90%	143	1.61%	98	1.11%	258	2.91%
ALLENS PARK	186	\$35,938	421	410	97.39%	1	0.13%	1	0.30%	9	2.18%	11	2.61%
ARVADA*	50,997	\$41,220	130,185	122,288	93.93%	843	0.65%	2,628	2.02%	4,426	3.40%	9,594	7.37%
AURORA	38,687	\$30,299	90,310	66,841	74.01%	16,930	18.75%	3,669	4.06%	2,869	3.18%	7,608	8.42%
BOULDER	31,643	\$34,148	75,646	69,448	91.81%	938	1.24%	3,354	4.43%	1,907	2.52%	4,206	5.56%
BRIGHTON	7,466	\$33,111	22,014	18,319	83.21%	240	1.09%	310	1.41%	3,146	14.29%	6,007	27.29%
BROOMFIELD	22,304	\$44,989	62,776	58,116	92.58%	568	0.90%	2,087	3.33%	2,005	3.19%	5,291	8.43%
CAPITOL HILL	16,247	\$19,855	24,499	17,823	72.75%	4,403	17.97%	367	1.50%	1,905	7.78%	3,789	15.47%
CASTLE ROCK	7,282	\$53,902	19,946	19,416	97.34%	102	0.51%	138	0.69%	289	1.45%	620	3.11%
COAL CREEK CANYON	1,512	\$45,000	3,865	3,794	98.17%	9	0.22%	27	0.71%	35	0.91%	123	3.19%
COLUMBINE	28,965	\$51,175	83,961	80,024	95.31%	654	0.78%	1,330	1.58%	1,953	2.33%	5,251	6.25%
COTTONWOOD	12,611	\$42,982	33,963	31,133	91.67%	323	0.95%	836	2.46%	1,670	4.92%	3,145	9.26%
CURTIS PARK	8,272	\$17,752	23,251	7,423	31.93%	7,177	30.87%	326	1.40%	8,325	35.80%	11,129	47.86%
DECKERS	175	\$33,167	393	381	97.11%	0	0.03%	1	0.32%	10	2.54%	20	4.98%
DENVER EAST*	43,288	\$30,766	89,964	56,043	62.29%	28,515	31.70%	1,864	2.07%	3,542	3.94%	8,850	9.84%
DENVER MAIN	10,792	\$18,549	27,461	14,035	51.11%	1,495	5.44%	1,111	4.05%	10,820	39.40%	15,004	54.64%
DENVER NE	16,803	\$29,531	47,211	39,873	84.46%	1,108	2.35%	643	1.36%	5,587	11.83%	12,482	26.44%
DENVER NORTH*	23,035	\$24,833	58,440	42,183	72.18%	959	1.64%	1,176	2.01%	14,121	24.16%	25,991	44.47%
DENVER SE*	23,522	\$34,879	48,037	43,084	89.69%	2,446	5.09%	1,236	2.57%	1,271	2.65%	4,148	8.64%
DENVER SOUTH	27,097	\$30,544	52,949	46,285	87.42%	1,235	2.33%	1,150	2.17%	4,279	8.08%	8,665	16.37%
DENVER SW*	36,041	\$42,407	86,798	80,633	92.90%	1,002	1.15%	1,929	2.22%	3,234	3.73%	7,621	8.78%
DENVER WEST*	30,835	\$28,274	79,861	58,839	73.68%	1,551	1.94%	2,891	3.62%	16,580	20.76%	28,273	35.40%
DRY CREEK*	29,142	\$59,935	79,115	74,694	94.41%	1,866	2.36%	1,941	2.45%	613	0.77%	3,129	3.95%
ENGLEWOOD	16,759	\$31,222	37,930	35,329	93.14%	622	1.64%	541	1.43%	1,437	3.79%	3,088	8.14%
ERIE	1,138	\$40,939	3,225	2,892	89.69%	12	0.37%	18	0.56%	303	9.38%	575	17.83%
EVERGREEN	7,850	\$55,042	20,643	20,297	98.33%	58	0.28%	126	0.61%	162	0.79%	620	3.00%
GOLDEN	12,013	\$41,432	29,551	28,018	94.81%	304	1.03%	581	1.97%	648	2.19%	1,520	5.14%
GUNBARREL	5,098	\$50,665	12,195	11,411	93.57%	203	1.67%	372	3.05%	209	1.71%	487	3.99%
HIGHLANDS RANCH*	6,782	\$62,419	18,960	18,269	96.35%	203	1.07%	233	1.23%	255	1.34%	613	3.23%
LAKWOOD*	28,421	\$34,793	66,669	60,940	91.41%	760	1.14%	1,356	2.03%	3,613	5.42%	6,702	10.05%
LARKSPUR	775	\$55,120	2,148	2,093	97.44%	9	0.44%	12	0.57%	33	1.55%	49	2.28%
LITTLETON	27,046	\$45,211	68,827	65,613	95.33%	689	1.00%	1,277	1.86%	1,247	1.81%	3,932	5.71%
LONGMONT	24,098	\$38,688	63,710	59,049	92.69%	244	0.38%	871	1.37%	3,545	5.56%	6,324	9.93%
LOOKOUT MOUNTAIN	2,044	\$71,611	5,388	5,247	97.39%	12	0.21%	74	1.37%	55	1.02%	164	3.05%
LYONS	1,392	\$39,326	3,787	3,682	97.25%	12	0.31%	12	0.31%	81	2.14%	157	4.15%

*VDT facilities will be deployed in these Wire Centers

Note: Persons of Hispanic origin may be of any race.

Source: Wire Center information was derived using data from Infomark PC Marketing System from National Decision Systems and U S WEST Wire Center boundaries. Sources of Infomark data include U. S. Census information, surveys of consumer finances, annual county income/population by residence and internal revenue records.

5/25/94

**Demographic Profile Report by MSA/Wire Center
Denver**

Wire Center	Household Total (1994 Est.)	Household Median Income (1994 Est.)	Population Total (1994 Est.)	Population by Race White (1994)	Population by Race % White (1994)	Population by Race Black (1994)	Population by Race % Black (1994)	Population by Race Asian, Pac Isld (1994)	Population by Race % Asian, Pac Isld (1994)	Population by Race Am Indian, Other (1994)	Population by Race % Am Indian, Other (1994)	Population Hispanic (1994)	Population % Hispanic (1994)
MONTBELLO	6,924	\$36,513	23,284	7,847	33.70%	13,078	56.17%	790	3.39%	1,569	6.74%	3,229	13.87%
MORRISON	5,152	\$58,115	15,001	14,563	97.08%	65	0.44%	138	0.92%	234	1.56%	623	4.15%
NEDERLAND	1,168	\$38,494	2,822	2,744	97.25%	17	0.59%	14	0.50%	47	1.66%	99	3.52%
NIWOT	1,279	\$50,455	3,293	3,176	96.45%	21	0.63%	57	1.74%	39	1.18%	114	3.46%
NORTHGLENN	24,642	\$39,787	69,660	63,297	90.87%	1,063	1.53%	1,439	2.07%	3,861	5.54%	10,350	14.86%
PARKER	7,319	\$60,858	21,654	21,138	97.62%	131	0.61%	144	0.66%	241	1.11%	555	2.56%
SMOKY HILL	28,970	\$48,154	83,727	74,660	89.17%	4,925	5.88%	2,692	3.22%	1,449	1.73%	4,470	5.34%
SULLIVAN*	52,249	\$38,963	112,759	93,124	82.59%	12,244	10.86%	4,990	4.43%	2,401	2.13%	7,187	6.37%
TABLE MESA	12,484	\$47,432	29,899	28,160	94.18%	311	1.04%	852	2.85%	576	1.93%	1,306	4.37%
WARD	154	\$40,132	365	351	96.15%	3	0.89%	4	1.17%	7	1.78%	12	3.18%
WESTMINSTER*	34,413	\$31,734	88,165	76,170	86.40%	973	1.10%	3,836	4.35%	7,186	8.15%	17,077	19.37%
Total	777,851	\$39,132	1,933,588	1,657,613	85.73%	108,492	5.61%	49,588	2.56%	117,895	6.10%	240,469	12.44%
Total for VDT Facilities	358,725	\$37,991	858,951	726,266	84.55%	51,362	5.98%	24,081	2.80%	57,242	6.66%	119,185	13.88%
Total Excluding VDT Facilities	419,126	\$40,106	1,074,637	931,347	86.67%	57,129	5.32%	25,508	2.37%	60,653	5.64%	121,285	11.29%
Denver MSA	731,262	\$38,700	1,807,891	1,526,310	84.42%	116,865	6.46%	47,559	2.63%	117,157	6.48%	235,525	13.03%

*VDT facilities will be deployed in these Wire Centers

Note: Persons of Hispanic origin may be of any race.

**Demographic Profile Report by MSA/Wire Center
Minneapolis/St. Paul**

Wire Center	Household Total (1994 Est.)	Household Median Income (1994 Est.)	Population Total (1994 Est.)	Population by Race White (1994)	Population by Race % White (1994)	Population by Race Black (1994)	Population by Race % Black (1994)	Population by Race Asian, Pac Isld (1994)	Population by Race % Asian, Pac Isld (1994)	Population by Race Am Indian, Other (1994)	Population by Race % Am Indian, Other (1994)	Population Hispanic (1994)	Population % Hispanic (1994)
AFTON	3,817	\$56,510	11,270	11,108	98.56%	19	0.17%	88	0.78%	56	0.49%	120	1.06%
ANOKA	21,252	\$43,823	63,302	61,869	97.74%	261	0.41%	628	0.99%	544	0.86%	547	0.86%
BEARD*	36,133	\$45,937	79,508	76,353	96.03%	1,170	1.47%	1,526	1.92%	458	0.58%	851	1.07%
BEECH*	27,950	\$29,114	72,188	59,731	82.74%	3,730	5.17%	6,316	8.75%	2,411	3.34%	3,104	4.30%
BLAINE	24,577	\$42,525	68,904	66,382	96.34%	447	0.65%	1,341	1.95%	733	1.06%	777	1.13%
BRAHAM	1,805	\$30,152	4,923	4,891	99.35%	4	0.08%	11	0.22%	17	0.34%	22	0.44%
BROOKLYN CENTER	21,548	\$41,132	57,660	51,540	89.38%	3,522	6.11%	1,884	3.27%	715	1.24%	737	1.28%
BRYANT*	26,148	\$31,164	68,959	47,659	69.11%	16,746	24.28%	1,974	2.86%	2,580	3.74%	1,427	2.07%
BUFFALO	4,414	\$36,886	12,839	12,699	98.91%	10	0.08%	67	0.52%	62	0.49%	53	0.42%
BURNSVILLE	16,794	\$48,179	45,050	42,416	94.15%	1,047	2.32%	1,318	2.93%	269	0.60%	548	1.22%
CAMBRIDGE	4,080	\$32,562	11,439	11,286	98.66%	37	0.32%	55	0.48%	61	0.54%	53	0.46%
CEDAR	3,807	\$37,833	8,905	7,989	89.72%	392	4.40%	432	4.85%	91	1.03%	114	1.28%
CENTRAL AVE*	21,125	\$32,212	47,527	44,689	94.03%	688	1.45%	870	1.83%	1,280	2.69%	785	1.65%
CLEVELAND	16,830	\$43,660	43,856	41,522	94.68%	497	1.13%	1,582	3.61%	254	0.58%	642	1.46%
COON RAPIDS	22,284	\$45,322	68,395	66,647	97.44%	350	0.51%	673	0.98%	725	1.06%	707	1.03%
COTTAGE GROVE	11,331	\$47,622	35,390	34,131	96.44%	428	1.21%	390	1.10%	440	1.24%	658	1.86%
CRYSTAL*	24,849	\$38,480	61,473	57,091	92.87%	2,326	3.78%	1,418	2.31%	637	1.04%	788	1.28%
EDEN PRAIRIE	16,387	\$58,115	41,893	40,038	95.57%	515	1.23%	1,190	2.84%	150	0.36%	388	0.93%
EMERSON*	19,294	\$39,017	44,920	42,425	94.45%	925	2.06%	1,231	2.74%	339	0.76%	851	1.89%
EXCELSIOR	8,815	\$55,221	23,906	23,361	97.72%	114	0.48%	355	1.48%	76	0.32%	220	0.92%
FERNBROOK	11,409	\$55,806	31,708	30,407	95.90%	453	1.43%	697	2.20%	150	0.47%	330	1.04%
FOREST LAKE	5,821	\$43,129	16,542	16,269	98.35%	56	0.34%	75	0.45%	141	0.85%	161	0.98%
FRANKLIN	19,000	\$20,875	35,702	22,537	63.13%	8,417	23.58%	1,885	5.28%	2,862	8.02%	1,288	3.61%
FRIDLEY	13,140	\$40,133	32,410	30,870	95.25%	412	1.27%	684	2.11%	444	1.37%	380	1.17%
FRONT*	16,619	\$30,422	39,724	31,474	79.23%	2,362	5.95%	4,985	12.55%	902	2.27%	1,363	3.43%
FT SNELLING	1,687	\$31,179	3,888	3,446	88.63%	296	7.62%	73	1.88%	73	1.87%	87	2.24%
GLEN PRAIRIE	13,929	\$56,322	39,340	37,946	96.46%	409	1.04%	797	2.03%	188	0.48%	356	0.90%
HAMEL	945	\$57,994	3,016	2,957	98.06%	14	0.46%	34	1.13%	11	0.35%	26	0.87%
HANOVER	805	\$49,052	2,611	2,577	98.68%	4	0.14%	14	0.54%	17	0.64%	20	0.78%
HOPKINS*	22,892	\$43,044	52,320	50,256	96.06%	714	1.36%	1,031	1.97%	319	0.61%	564	1.08%
ISANTI	3,001	\$36,358	9,100	8,974	98.61%	21	0.23%	34	0.38%	71	0.78%	47	0.52%
LEXINGTON	23,978	\$51,430	64,263	60,712	94.47%	1,383	2.15%	1,733	2.70%	435	0.68%	889	1.38%
MAPLEWOOD*	21,341	\$42,168	54,780	50,849	92.82%	1,776	3.24%	1,396	2.55%	759	1.39%	1,286	2.35%
MARKET	27,955	\$26,227	67,691	45,461	67.16%	9,749	14.40%	8,837	13.06%	3,644	5.38%	5,160	7.62%
MIDWAY*	23,398	\$32,093	57,982	47,770	82.39%	5,800	10.00%	3,550	6.12%	863	1.49%	1,488	2.57%
MPLS 24TH AVE*	28,102	\$31,887	66,247	54,670	82.52%	4,717	7.12%	1,950	2.94%	4,910	7.41%	1,595	2.41%

*VDT facilities will be deployed in these Wire Centers

Note: Persons of Hispanic origin may be of any race.

Demographic Profile Report by MSA/Wire Center
Minneapolis/St. Paul

Wire Center	Household Total (1994 Est.)	Household Median Income (1994 Est.)	Population Total (1994 Est.)	Population by Race White (1994)	Population by Race % White (1994)	Population by Race Black (1994)	Population by Race % Black (1994)	Population by Race Asian, Pac Isld (1994)	Population by Race % Asian, Pac Isld (1994)	Population by Race Am Indian, Other (1994)	Population by Race % Am Indian, Other (1994)	Population Hispanic (1994)	Population % Hispanic (1994)
MPLS 66TH ST	19,881	\$36,900	45,277	41,262	91.13%	2,086	4.61%	1,417	3.13%	512	1.13%	604	1.33%
MPLS 7TH AVE	12,335	\$25,520	30,307	25,830	85.23%	1,176	3.88%	2,597	8.57%	704	2.32%	678	2.24%
MPLS DOWNTOWN	12,906	\$21,538	24,385	18,465	75.73%	3,370	13.82%	1,856	7.61%	693	2.84%	690	2.83%
NAVARRE	1,765	\$48,330	4,275	4,206	98.38%	16	0.38%	39	0.90%	15	0.34%	33	0.77%
NORMANDALE*	10,754	\$47,702	24,072	22,935	95.28%	363	1.51%	672	2.79%	103	0.43%	257	1.07%
NORTH BRANCH	2,771	\$33,834	8,052	7,928	98.46%	25	0.31%	30	0.38%	69	0.85%	36	0.45%
OAK GROVE	4,439	\$46,590	14,680	14,438	98.35%	45	0.31%	82	0.56%	115	0.78%	103	0.70%
OAKDALE WEST	26,187	\$39,890	66,829	64,712	96.83%	470	0.70%	556	0.83%	1,091	1.63%	1,892	2.83%
ORCHARD	24,878	\$46,115	59,452	56,361	94.80%	1,311	2.20%	1,369	2.30%	410	0.69%	700	1.18%
PARK ROW	18,869	\$43,998	51,716	49,910	96.51%	737	1.42%	679	1.31%	390	0.75%	788	1.52%
PENN	10,250	\$32,361	23,987	15,626	65.14%	4,552	18.98%	3,491	14.56%	318	1.32%	514	2.14%
PILLSBURY*	29,795	\$34,258	69,466	50,860	73.22%	13,732	19.77%	2,862	4.12%	2,012	2.90%	1,423	2.05%
RICE*	22,590	\$46,981	59,522	57,110	95.95%	584	0.98%	1,549	2.60%	279	0.47%	827	1.39%
ROCKFORD	1,831	\$39,645	5,302	5,218	98.41%	19	0.36%	20	0.38%	45	0.84%	32	0.61%
RUSH CITY	1,492	\$29,247	4,021	3,981	99.01%	4	0.11%	9	0.22%	26	0.66%	21	0.52%
SHAKOPEE	6,985	\$43,926	19,830	19,246	97.05%	163	0.82%	167	0.84%	254	1.28%	162	0.82%
SODERVILLE	6,014	\$44,040	19,310	19,001	98.40%	43	0.22%	124	0.64%	143	0.74%	136	0.70%
SOUTH	17,548	\$42,423	43,232	40,847	94.48%	762	1.76%	1,366	3.16%	257	0.60%	487	1.13%
STILLWATER	10,142	\$48,095	29,373	28,320	96.42%	564	1.92%	196	0.67%	294	1.00%	311	1.06%
WAYZATA	12,858	\$60,473	36,187	35,039	96.83%	406	1.12%	567	1.57%	176	0.49%	339	0.94%
WHITE BEAR LAKE	19,172	\$46,703	54,082	52,977	97.96%	241	0.45%	555	1.03%	308	0.57%	689	1.27%
Total	840,724	\$42,926	2,142,987	1,935,274	90.31%	100,481	4.69%	71,329	3.33%	35,903	1.68%	39,156	1.83%
Total for VDT Facilities	330,990	\$39,561	798,687	693,871	86.88%	55,633	6.97%	31,330	3.92%	17,853	2.24%	16,611	2.08%
Total Excluding VDT Facilities	509,734	\$45,004	1,344,300	1,241,403	92.35%	44,848	3.34%	39,999	2.98%	18,050	1.34%	22,545	1.68%
Minneapolis/St. Paul MSA	1,026,529	\$43,399	2,675,102	2,451,194	91.63%	107,297	4.01%	78,605	2.94%	38,006	1.42%	44,802	1.67%

*VDT facilities will be deployed in these Wire Centers

Note: Persons of Hispanic origin may be of any race.

**Demographic Profile Report by MSA/Wire Center
Portland/Vancouver**

Wire Center	Household Total (1994 Est.)	Household Median Income (1994 Est.)	Population Total (1994 Est.)	Population by Race White (1994)	Population by Race % White (1994)	Population by Race Black (1994)	Population by Race % Black (1994)	Population by Race Asian, Pac Isld (1994)	Population by Race % Asian, Pac Isld (1994)	Population by Race Am Indian, Other (1994)	Population by Race % Am Indian, Other (1994)	Population Hispanic (1994)	Population % Hispanic (1994)
BURLINGTON	892	\$37,041	2,207	2,138	96.88%	3	0.13%	29	1.32%	37	1.67%	60	2.70%
GOVERNMENT CAMP	76	\$29,167	176	170	96.59%	1	0.36%	2	1.25%	3	1.79%	12	6.81%
LAKE OSWEGO	14,895	\$54,405	36,733	35,137	95.65%	236	0.64%	1,087	2.96%	274	0.75%	721	1.96%
NORTH PLAINS	1,911	\$41,361	5,747	5,229	90.99%	6	0.10%	50	0.87%	462	8.04%	480	8.36%
OAK GROVE/MILWAUKIE*	24,587	\$35,390	57,851	55,066	95.19%	350	0.60%	1,507	2.61%	928	1.60%	1,530	2.64%
OREGON CITY	22,433	\$38,594	61,236	58,971	96.30%	269	0.44%	1,100	1.80%	896	1.46%	1,377	2.25%
PORTLAND ALPINE*	36,965	\$30,824	90,666	81,121	89.47%	1,889	2.08%	5,841	6.44%	1,813	2.00%	2,947	3.25%
PORTLAND ATLANTIC*	35,326	\$29,027	87,266	59,691	68.40%	21,676	24.84%	3,805	4.36%	2,093	2.40%	3,179	3.64%
PORTLAND BELMONT	36,651	\$26,933	78,938	68,329	86.56%	2,651	3.36%	6,003	7.61%	1,955	2.48%	2,738	3.47%
PORTLAND BUTLER	23,841	\$26,645	61,184	45,223	73.91%	10,273	16.79%	3,282	5.36%	2,406	3.93%	2,667	4.36%
PORTLAND CAPITOL	24,191	\$25,569	41,408	37,005	89.37%	1,468	3.55%	2,120	5.12%	815	1.97%	1,281	3.09%
PORTLAND CHERRY*	26,962	\$39,766	63,223	59,124	93.52%	870	1.38%	2,508	3.97%	721	1.14%	1,628	2.58%
PORTLAND CYPRESS	11,113	\$47,288	25,497	24,139	94.68%	192	0.75%	936	3.67%	229	0.90%	556	2.18%
PORTLAND HAROLD	15,176	\$31,239	40,969	37,857	92.40%	525	1.28%	1,721	4.20%	866	2.11%	1,258	3.07%
PORTLAND PROSPECT*	31,585	\$27,983	78,448	70,133	89.40%	1,088	1.39%	5,347	6.82%	1,880	2.40%	2,561	3.26%
BATTLEGROUND	7,312	\$39,019	22,580	21,904	97.01%	78	0.34%	224	0.99%	374	1.65%	525	2.33%
ORCHARDS	33,288	\$38,797	92,721	86,579	93.38%	1,292	1.39%	3,217	3.47%	1,633	1.76%	2,577	2.78%
RIDGEFIELD	2,503	\$36,777	7,419	7,225	97.39%	22	0.30%	53	0.71%	119	1.61%	157	2.12%
VANCOUVER NORTH	14,280	\$40,555	38,491	36,662	95.25%	368	0.96%	909	2.36%	551	1.43%	959	2.49%
VANCOUVER OXFORD	28,796	\$27,939	67,024	62,178	92.77%	1,271	1.90%	2,193	3.27%	1,382	2.06%	1,997	2.98%
YACOLT	796	\$33,103	2,620	2,515	95.99%	7	0.26%	15	0.57%	83	3.17%	75	2.84%
Total	393,578	\$34,443	962,401	856,395	88.99%	44,533	4.63%	41,951	4.36%	19,522	2.03%	29,285	3.04%
Total for VDT Facilities	155,425	\$33,441	377,453	325,135	86.14%	25,873	6.85%	19,009	5.04%	7,436	1.97%	11,845	3.14%
Total Excluding													
VDT Facilities	238,154	\$35,197	584,948	531,260	90.82%	18,660	3.19%	22,942	3.92%	12,087	2.07%	17,440	2.98%
Portland/Vancouver MSA	663,003	\$36,886	1,681,875	1,523,887	90.61%	51,502	3.06%	66,109	3.93%	40,377	2.40%	60,328	3.59%

*VDT facilities will be deployed in these Wire Centers

Note: Persons of Hispanic origin may be of any race.

STATE OF COLORADO)
)
COUNTY OF DENVER) ss.

AFFIDAVIT

I, Susan A. Portwood, first being duly sworn, hereby states that the following information is true and correct to the best of my knowledge, information and belief:

1. I am an employee of U S WEST Communications, Inc. My title is Director - Product Development, Broadband and Multimedia Services. My business address is 1999 Broadway, Suite 2800, Denver, Colorado 80202.
2. In my capacity as Director of Product Development, I am responsible for the design, pricing and deployment of U S WEST's basic video dialtone platform.
3. As Director of Product Development, I was involved in recommending and selecting those portions of the Denver, Portland and Minneapolis - St. Paul service areas in which U S WEST proposes to deploy video dialtone service during the 1995-96 timeframe.
4. I have examined the Petitions of the Center for Media Education and Consumer Federation of America ("CME") and the Oregon and Minnesota Cable Television Associations ("OCTA"). Their claim that U S WEST will engage in "red-lining" low-income neighborhoods by building broadband facilities only in the wealthiest areas is patently false.
5. In determining the wire centers where U S WEST would first construct broadband facilities in Denver, Minneapolis - St. Paul and Portland, and deploy video dialtone service, many factors were considered including: current telephone usage and growth rates; current network operating costs and network density; the percentage of residence lines; video entertainment consumption patterns; and demographic data. The demographic data included size of household, household income, percent owner-occupied housing and household density.

- 6. Of these factors, telephone usage and growth, and network operational/cost characteristics had the greatest influence on the locations selected for the initial deployment of VDT service. Household income was not a determining factor.

- 7. I have included tables of household income by wire center for Denver, Minneapolis - St. Paul and Portland. These tables demonstrate that the allegation that U S WEST is only deploying video dialtone service in high income areas has no basis in fact.

Susan A. Portwood
Susan A. Portwood

Subscribed and sworn to before me this 11th day of March, 1994, by Susan A. Portwood.

WITNESS my hand and official seal.

DAnn Beltrame
Notary Public

My Commission Expires: 12-18-97

Income Report by MSA/Wire Center

State	MSA	Wire Center	Total Households (1993 Est.)	Household: Median Income (1993 Est.)
CO	Denver	ABERDEEN	2,780	\$64,164
CO	Denver	ALLENS PARK	186	\$37,519
CO	Denver	ARVADA*	50,997	\$41,365
CO	Denver	AURORA	38,687	\$30,502
CO	Denver	BOULDER	31,643	\$36,947
CO	Denver	BRIGHTON	7,466	\$33,635
CO	Denver	BROOMFIELD	22,304	\$46,031
CO	Denver	CAPITOL HILL	16,247	\$21,167
CO	Denver	CASTLE ROCK	7,282	\$54,482
CO	Denver	COAL CREEK CANYON	1,512	\$44,964
CO	Denver	COLUMBINE	28,965	\$52,362
CO	Denver	COTTONWOOD	12,611	\$43,200
CO	Denver	CURTIS PARK	8,272	\$18,593
CO	Denver	DECKERS	175	\$33,203
CO	Denver	DENVER EAST*	43,288	\$33,619
CO	Denver	DENVER MAIN	10,792	\$19,177
CO	Denver	DENVER NE	16,803	\$29,478
CO	Denver	DENVER NORTH*	23,035	\$24,872
CO	Denver	DENVER SE*	23,522	\$38,693
CO	Denver	DENVER SOUTH	27,097	\$33,071
CO	Denver	DENVER SW*	36,041	\$42,975
CO	Denver	DENVER WEST*	30,835	\$28,715
CO	Denver	DRY CREEK*	29,142	\$61,214
CO	Denver	ENGLEWOOD	16,759	\$36,220
CO	Denver	ERIE	1,138	\$40,983
CO	Denver	EVERGREEN	7,850	\$56,306
CO	Denver	GOLDEN	12,013	\$42,666
CO	Denver	GUNBARREL	5,098	\$51,289
CO	Denver	HIGHLANDS RANCH*	6,782	\$61,940
CO	Denver	LAKEWOOD*	28,421	\$35,970
CO	Denver	LARKSPUR	775	\$54,868
CO	Denver	LITTLETON	27,046	\$46,865
CO	Denver	LONGMONT	24,098	\$39,140
CO	Denver	LOOKOUT MOUNTAIN	2,044	\$74,893
CO	Denver	LYONS	1,392	\$40,182
CO	Denver	MONTBELLO	6,924	\$36,241
CO	Denver	MORRISON	5,152	\$59,868
CO	Denver	NEDERLAND	1,168	\$38,611
CO	Denver	NIWOT	1,279	\$50,452
CO	Denver	NORTHGLENN	24,642	\$39,832
CO	Denver	PARKER	7,319	\$60,828
CO	Denver	SMOKY HILL	28,970	\$49,773
CO	Denver	SULLIVAN*	52,249	\$39,740
CO	Denver	TABLE MESA	12,484	\$48,359
CO	Denver	WARD	154	\$41,372
CO	Denver	WESTMINSTER*	34,413	\$32,233

*VDT facilities will be deployed in these Wire Centers

Source: Wire Center information was derived using data from Infomark PC Marketing System from National Decision Systems and U S WEST Wire Center boundaries. Sources of Infomark data include U. S. Census information, surveys of consumer finances, annual county income/population by residence and internal revenue records.

Income Report by MSA/Wire Center

State	MSA	Wire Center	Total Households (1993 Est.)	Household: Median Income (1993 Est.)
MN	Minneapolis-St Paul	AFTON	3,817	\$56,911
MN	Minneapolis-St Paul	ANOKA	21,252	\$43,610
MN	Minneapolis-St Paul	BEARD*	36,133	\$48,827
MN	Minneapolis-St Paul	BEECH*	27,950	\$29,298
MN	Minneapolis-St Paul	BLAINE	24,577	\$42,649
MN	Minneapolis-St Paul	BRAHAM	1,805	\$29,962
MN	Minneapolis-St Paul	BROOKLYN CENTER	21,548	\$40,575
MN	Minneapolis-St Paul	BRYANT*	26,148	\$31,365
MN	Minneapolis-St Paul	BUFFALO	4,414	\$37,014
MN	Minneapolis-St Paul	BURNSVILLE	16,794	\$48,261
MN	Minneapolis-St Paul	CAMBRIDGE	4,080	\$32,441
MN	Minneapolis-St Paul	CEDAR	3,807	\$37,934
MN	Minneapolis-St Paul	CENTRAL AVE*	21,125	\$32,386
MN	Minneapolis-St Paul	CLEVELAND	16,830	\$44,833
MN	Minneapolis-St Paul	COON RAPIDS	22,284	\$45,565
MN	Minneapolis-St Paul	COTTAGE GROVE	11,331	\$48,063
MN	Minneapolis-St Paul	CRYSTAL*	24,849	\$38,183
MN	Minneapolis-St Paul	EDEN PRAIRIE	16,387	\$61,629
MN	Minneapolis-St Paul	EMERSON*	19,294	\$40,249
MN	Minneapolis-St Paul	EXCELSIOR	8,815	\$55,959
MN	Minneapolis-St Paul	FERNBROOK	11,409	\$56,616
MN	Minneapolis-St Paul	FOREST LAKE	5,821	\$42,693
MN	Minneapolis-St Paul	FRANKLIN	19,000	\$21,531
MN	Minneapolis-St Paul	FRIDLEY	13,140	\$40,787
MN	Minneapolis-St Paul	FRONT*	16,619	\$30,636
MN	Minneapolis-St Paul	FT SNELLING	1,687	\$30,891
MN	Minneapolis-St Paul	GLEN PRAIRIE	13,929	\$56,171
MN	Minneapolis-St Paul	HAMEL	945	\$58,950
MN	Minneapolis-St Paul	HANOVER	805	\$49,194
MN	Minneapolis-St Paul	HOPKINS*	22,892	\$45,666
MN	Minneapolis-St Paul	ISANTI	3,001	\$36,097
MN	Minneapolis-St Paul	LEXINGTON	23,978	\$52,071
MN	Minneapolis-St Paul	MAPLEWOOD*	21,341	\$43,153
MN	Minneapolis-St Paul	MARKET	27,955	\$27,251
MN	Minneapolis-St Paul	MIDWAY*	23,398	\$32,943
MN	Minneapolis-St Paul	MPLS 24TH AVE*	28,102	\$32,310
MN	Minneapolis-St Paul	MPLS 66TH ST	19,881	\$37,110
MN	Minneapolis-St Paul	MPLS 7TH AVE	12,335	\$26,452
MN	Minneapolis-St Paul	MPLS DOWNTOWN	12,906	\$23,776
MN	Minneapolis-St Paul	NAVARRE	1,765	\$54,912
MN	Minneapolis-St Paul	NORMANDALE*	10,754	\$49,680
MN	Minneapolis-St Paul	NORTH BRANCH	2,771	\$33,746
MN	Minneapolis-St Paul	OAK GROVE	4,439	\$46,942
MN	Minneapolis-St Paul	OAKDALE WEST	26,187	\$40,621
MN	Minneapolis-St Paul	ORCHARD	24,878	\$47,613
MN	Minneapolis-St Paul	PARK ROW	18,869	\$44,416
MN	Minneapolis-St Paul	PENN	10,250	\$39,100
MN	Minneapolis-St Paul	PILLSBURY*	29,795	\$36,587
MN	Minneapolis-St Paul	RICE*	22,590	\$49,695
MN	Minneapolis-St Paul	ROCKFORD	1,831	\$39,818
MN	Minneapolis-St Paul	RUSH CITY	1,492	\$29,238
MN	Minneapolis-St Paul	SHAKOPEE	6,985	\$43,783
MN	Minneapolis-St Paul	SODERVILLE	6,014	\$43,910
MN	Minneapolis-St Paul	SOUTH	17,548	\$42,608
MN	Minneapolis-St Paul	STILLWATER	10,142	\$48,323
MN	Minneapolis-St Paul	WAYZATA	12,858	\$63,044
MN	Minneapolis-St Paul	WHITE BEAR LAKE	19,172	\$47,786

*VDT facilities will be deployed in these Wire Centers

Sources: Wire Center information was derived using data from Infomark FC Marketing System from National Decision Systems and U S WEST Wire Center boundaries. Sources of Infomark data include U. S. Census information, surveys of consumer finances, annual county income/population by residence and internal revenue records.

Income Report by MSA/Wire Center

State	MSA	Wire Center	Total Households (1993 Est.)	Household: Median Income (1993 Est.)
OR	Portland	BURLINGTON	892	\$36,730
OR	Portland	GOVERNMENT CAMP	76	\$28,981
OR	Portland	LAKE OSWEGO	14,895	\$55,694
OR	Portland	NORTH PLAINS	1,911	\$41,706
OR	Portland	OAK GROVE MILWAUKIE*	24,587	\$35,657
OR	Portland	OREGON CITY	22,433	\$39,897
OR	Portland	PORTLAND ALPINE*	36,965	\$31,214
OR	Portland	PORTLAND ATLANTIC*	35,326	\$29,996
OR	Portland	PORTLAND BELMONT	36,651	\$27,769
OR	Portland	PORTLAND BUTLER	23,841	\$27,014
OR	Portland	PORTLAND CAPITOL	24,191	\$30,252
OR	Portland	PORTLAND CHERRY*	26,962	\$40,863
OR	Portland	PORTLAND CYPRESS	11,113	\$49,006
OR	Portland	PORTLAND HAROLD	15,176	\$31,623
OR	Portland	PORTLAND PROSPECT*	31,585	\$28,887
WA	Portland	BATTLEGROUND	7,312	\$38,774
WA	Portland	ORCHARDS	33,288	\$39,176
WA	Portland	RIDGEFIELD	2,503	\$37,062
WA	Portland	VANCOUVER NORTH	14,280	\$40,608
WA	Portland	VANCOUVER OXFORD	28,796	\$28,919
WA	Portland	YACOLT	796	\$33,047

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