GVNW

April 22, 1997

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Mr. William F. Caton
Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Re: CC Docket 96-45
Ex Parte Presentation

Dear Mr. Caton:

On February 20, 1997, Mr. Bob Schoonmaker and I met with members of the Docket 96-45 Joint Board Staff at the Commission's office on the 8th floor of 2100 M Street, N.W., Washington D.C. The Joint Board staff members requested that GVNW provide additional information relating to small companies. Per the Joint Board Staff's request, GVNW contacted 20 clients and requested information on sheath cable footage, cable investment, particular network structure data, structure sharing and fill rates. Preliminary data was forwarded to the Joint Board Staff in March, 1997. Complete results of that request are enclosed.

GVNW has performed some summarization of the data collected. In some areas, this summarization was constrained due to the output structures of the models. The following attachments are included. A copy of all the data has also been provided on disk.

Attachment 1:	Summary of all client data collected.
Attachment 2:	Depreciation Reserve Data, where available
Attachment 3:	Actual Cable Mix, Cable Investment, Cable Footage and Investment per Foot
Attachment 4:	Hatfield Cable Mix, Cable Investment, Cable Footage and Investment per Foot
Attachment 5:	Benchmark Cable Mix, Cable Investment, Cable Footage and Investment per Foot

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Attachment 6:	Comparison of actual cable footage deployed versus cable footage deployed by the Hatfield and BCPM models.
Attachment 7:	Structure Sharing Results, Poles and Trenches
Attachment 8:	Effective Fill Rate Comparison
Attachment 9:	Cable Mix Comparison
Attachment 10:	Investment per Foot Comparison
Attachment 11:	Investment by Terrain
Attachment 12:	Capital Investment comparison of embedded results versus results from the Hatfield and the BCPM models
Attachment 13:	Comparison of Expenses for 75 small companies on a plant and category basis. (Provided previously)
Attachment 14:	Summary of Switching data for Small Telcos (provided, in part, previously)
Attachment 15:	Capital Structure, actual results

A quick review of the data does evidence where some of the inputs can be modified to be more representative of a small telephone company environment. In particular, the cable mix and structure sharing inputs are significantly different from those currently listed in the models. The data also points out that there is still a high degree of error in reporting access lines and the amount of plant actually placed. Although, the Hatfield reports more conservative loop and switch investments than the BCPM, note that the Hatfield overstates dedicated transmission costs SIGNIFICANTLY! Finally, although the expense and capital comparisons are a reflection of forward-looking to historical costs, the degree of error suggests that the forward-looking numbers still need some refinement.

One final comment concerning the models and the selection process. It is not only the quality of the models which bears importance to the selection process, but also, the flexibility and willingness of the model developers to work with industry to refine and support the model on an ongoing basis. A great model without the support available to allow analysis of it has little value. As one works through the analysis process, questions concerning the models' structure and algorithms inevitably arise. It is important to note that **all questions** posed to Sprint and USWest have been satisfactorily responded to with an earnest interest in supporting industry's' efforts and gaining information that makes their model a better product. With regard to the Hatfield, however, GVNW has not received a satisfactory response. GVNW contacted Hatfield Associates on three occasions. On all three occasions, Hatfield conveyed that they do not have the time or staff to support the model in this way. Alternatively, Hatfield suggested that a contractual arrangement could be pursued with them for support on a fee basis. GVNW requested a alternative contact within AT&T; this was never provided. Hatfield's unwillingness to be cooperative presents questions as to the ability to move forward with the analysis required to refine their model so that it will produce acceptable diverse, yet nationwide, results.

GVNW appreciates the opportunity to contribute to the model selection process. It is hoped that the small telco data provided will be helpful in future discussions concerning proper input levels and design parameters for whichever model is selected. If additional information will aid the Joint Board's selection process, please don't hesitate to contact us.

Sincerely,

Lisa Hanselman
Consulting Engineer

Attachment 1

COMPANY: Kingdom Telephone Company								
STATE: Missouri								
	Actual		Hatfield Results			BCPM Defaults		
	Fiber	Copper	Defaults	Fiber	Copper	Defaults	Fiber	Copper
Cable Mix - Feeder								
Aerial	0%	0%		60%	45%	6%	8%	n/a
Buried	100%	0%		5%	5%	74%	77%	n/a
Underground	0%	0%		35%	50%	20%	14%	n/a
Cable Mix - Distribution								
Aerial	0%	0%		n/a	25%	6%	34%	37%
Buried	0%	100%		n/a	75%	74%	66%	60%
Underground	0%	0%		n/a	0%	20%	0%	3%
Cable Cost/Foot - Feeder								
Aerial	$ -	$ -		$ 2.42	$ 3.27	n/a	$ 3.07	$ -
Buried	$ 7.14	$ -		$ 36.91	$ 27.57	n/a	$ 2.77	$ -
Underground	$ -	$ -		$ 0.41	$ 0.29	n/a	$ 3.09	$ -
Cable Cost/Foot - Distribution								
Aerial	$ -	$ -	n/a		$ 1.25	n/a	$ 3.11	$ 2.84
Buried	$ -	$33.92	n/a		$ 1.30	n/a	$ 2.75	$ 2.41
Underground	$ -	$ -	n/a		$ -	n/a	$ -	$ 3.55
Number of Manholes	--	0	n/a			n/a	153	
Number of Cross Connect Box	--	6	n/a			n/a	45	
Number of DLC (Large)	--	0	n/a			n/a	1	
Number of DLC (Small)		6	n/a			n/a	16	
Crossover point	--		9,000 ft	9,000 ft		12000	12000	
Structure Sharing:								
Number of Poles Leased		417	n/a	n/a		n/a	0	
Number of Poles Owned		396	n/a	n/a		n/a	3002	
% Poles Shared/No. Parties	21%	1	50%	50%		50%	50%	
% Trench Shared/No. Parties	0%	0	66%	66%		0%	0	
Fill Rates - Ave. Actual								
Feeder		50%	75%			80%	40%	n/a
Distribution		75%	55%	41%		55%	n/a	70%
Digital Loop Carrier		35%	90%			85%	n/a	n/a
Switch		90%	98%			85%	n/a	n/a
Interoffice Transport		30%	90%			95%	n/a	n/a

COMPANY: Hardy Telephone Company								
STATE: West Virginia								
	Actual		Hatfield Results			BCPM Defaults		
	Fiber	Copper	Defaults	Fiber	Copper	Defaults	Fiber	Copper
Cable Mix - Feeder								
Aerial	0%	77%		35%	0%	6%	8%	0%
Buried	0%	23%		5%	0%	74%	77%	0%
Underground	0%	0%		60%	0%	20%	15%	0%
Cable Mix - Distribution								
Aerial	0%	74%		0%	25%	6%	0%	37%
Buried	0%	26%		0%	75%	74%	0%	60%
Underground	0%	0%		0%	0%	20%	0%	3%
Cable Cost/Foot - Feeder								
Aerial	$ -	$ 1.19	$ -	$ 2.97	$ -	$ -	$ 3.04	$ -
Buried	$ -	$ 1.39	$ -	$ 38.07	$ -	$ -	$ 2.75	$ -
Underground	$ -	$ -	$ -	$ 0.25	$ -	$ -	$ 3.23	$ -
Cable Cost/Foot - Distribution								
Aerial	$ -	$ 1.19	$ -	$ -	$ 1.23	$ -	$ 2.59	$ -
Buried	$ -	$ 1.39	$ -	$ -	$ 1.28	$ -	$ 2.16	$ -
Underground	$ -	$ -	$ -	$ -	$ -	$ -	$ 2.42	$ -
Number of Manholes	--	0	n/a	n/a		n/a	31	
Number of Cross Connect Box	--	0	n/a	n/a		n/a	10	
Number of DLC (Large)	--	0	0.66	0.66		n/a	4	
Number of DLC (Small)		2	0.66	0.66		n/a	0	
Crossover point	--		9000 ft	9000 ft		12000 ft	12000 ft	
Structure Sharing:								
Number of Poles Leased		5958	n/a	n/a		n/a	n/a	
Number of Poles Owned		2554	n/a			n/a	893	
% Poles Shared/No. Parties	71%	1	66%	66%		50%		
% Trench Shared/No. Parties	0%		66%	66%		0%		
Fill Rates - Ave. Actual								
Feeder			75%			80%	67%	n/a
Distribution			55%	36%		55%	n/a	78%
Digital Loop Carrier			90%			85%	n/a	n/a
Switch			98%			85%	n/a	n/a
Interoffice Transport			90%			95%	n/a	n/a

COMPANY: TableTop Telephone								
STATE: Arizona								
	Actual		Hatfield Results			BCPM Defaults		
	Fiber	Copper	Defaults	Fiber	Copper	Defaults	Fiber	Copper
Cable Mix - Feeder								
Aerial	0%	64%		60%	45%	8%	10%	50%
Buried	0%	33%		5%	6%	77%	80%	25%
Underground	100%	3%		35%	49%	15%	10%	25%
Cable Mix - Distribution								
Aerial	0%	61%		0%	25%	8%	0%	40%
Buried	0%	39%		0%	75%	77%	0%	60%
Underground	0%	0%		0%	0%	15%	0%	0%
Cable Cost/Foot - Feeder								
Aerial	$ -	$ 5.71		1.67	3.23		2.2	0
Buried	$ -	$ 5.14		36.49	23.19		2.48	0.03
Underground	$ 2.19	$ 8.01		0.41	0.35		2.44	0.03
Cable Cost/Foot - Distribution								
Aerial	$ -	$ 2.64		0	0.63		0	2.53
Buried	$ -	$ 1.74		0	0		0	2.05
Underground	$ -	$ -		0	0		0	4.83
Number of Manholes	--	6					183	
Number of Cross Connect Box	--	0					147	
Number of DLC (Large)	--	0					1	
Number of DLC (Small)		13					27	
Crossover point	--			9000	9000	12000	12000	
Structure Sharing:								
Number of Poles Leased		972						
Number of Poles Owned		333					6656	
% Poles Shared/No. Parties	20%@2	80%@1	75%	75%		50%	50%	
% Trench Shared/No. Parties	0	0	66%	66%		0%	0%	
Fill Rates - Ave. Actual								
Feeder						80%	85%	79%
Distribution						45%		85%
Digital Loop Carrier						85%		
Switch						85%		
Interoffice Transport						95%		

COMPANY: Ayshire Farmers Mutual Telephone Company								
STATE: Iowa								
	Actual		Hatfield Results			BCPM Defaults		
	Fiber	Copper	Defaults	Fiber	Copper	Defaults	Fiber	Copper
Cable Mix - Feeder								
Aerial	0%	0%		60%	0%	8%	10%	0%
Buried	0%	100%		5%	0%	77%	80%	0%
Underground	0%	0%		35%	0%	15%	10%	0%
Cable Mix - Distribution								
Aerial	0%	0%		0%	25%	8%	0%	40%
Buried	100%	100%		0%	75%	77%	0%	60%
Underground	0%	0%		0%	0%	15%	0%	0%
Cable Cost/Foot - Feeder								
Aerial	$ -	$ -	n/a	$ 1.69	$ -	$ -	$ 2.63	$ -
Buried	$ -	$ 0.63	n/a	$ 37.20	$ -	$ -	$ 2.37	$ -
Underground	$ -	$ -	n/a	$ 0.41	$ -	$ -	$ 2.67	$ -
Cable Cost/Foot - Distribution								
Aerial	$ -	$ -	n/a	$ -	$ 1.34	n/a	$ -	$ 2.63
Buried	$ -	$ 0.67	n/a	$ -	$ 1.40	n/a	$ -	$ 2.16
Underground	$ -	$ -	n/a	$ -	$ -	n/a	$ -	$ -
Number of Manholes	--	0	n/a			n/a	9	
Number of Cross Connect Box	--	497	n/a			n/a	20	
Number of DLC (Large)	--	0	n/a			n/a	0	
Number of DLC (Small)		0	n/a			n/a	5	
Crossover point	--	depends	9000	9000		12000	12000	
Structure Sharing:								
Number of Poles Leased		0	n/a			n/a	n/a	
Number of Poles Owned		0	n/a			n/a	1189	
% Poles Shared/No. Parties		0%	50%	50%		50%	50%	
% Trench Shared/No. Parties		0%	66%	66%		0%	0%	
Fill Rates - Ave. Actual								
Feeder		88%				0.8	0.81	n/a
Distribution		75%		0.36		0.45	n/a	0.43
Digital Loop Carrier		0%				0.85	n/a	
Switch		80%				0.85	n/a	
Interoffice Transport		85%				0.95	n/a	

COMPANY: Price County Telephone								
STATE: Wisconsin								
	Actual		Hatfield Results			BCPM Defaults		
	Fiber	Copper	Defaults	Fiber	Copper	Defaults	Fiber	Copper
Cable Mix - Feeder								
Aerial	0%	0%		0.47	0.42	0.06	0.09	0
Buried	0%	100%		0.26	0.11	0.74	0.78	0.5
Underground	0%	0%		0.27	0.46	0.2	0.13	0.5
Cable Mix - Distribution								
Aerial	0%	0%		0	0.25	0.06	0	0.37
Buried	0%	100%		0	0.75	0.74	0	0.6
Underground	0%	0%		0	0	0.2	0	0.03
Cable Cost/Foot - Feeder								
Aerial	$ -	$ -		2.16	4.16	0	3.1	21.2
Buried	$ -	$ 1.75		7.12	14.73	0	2.8	0.02
Underground	$ -	$ -		0.53	0.93	0	3.16	0.01
Cable Cost/Foot - Distribution								
Aerial	$ -	$ -		0	1.27	0	0	0.3
Buried	$ -	$ 1.37		0	1.3	0	0	2.53
Underground	$ -	$ -		0	0	0	0	4.23
Number of Manholes	--	19	n/a			n/a	97	
Number of Cross Connect Box	--	6	n/a			n/a	34	
Number of DLC (Large)	--	0	n/a			n/a	3	
Number of DLC (Small)		0	n/a			n/a	5	
Crossover point	--	15-18kft		9000	9000	12000	12000	
Structure Sharing:								
Number of Poles Leased		0		n/a		n/a	0	
Number of Poles Owned		0		n/a		n/a	2030	
% Poles Shared/No. Parties	0%	0	66%	66%		50%	50%	
% Trench Shared/No. Parties	<5%	CATV	66%	66%		0%	0%	
Fill Rates - Ave. Actual								
Feeder		75%		13%		80%	67%	
Distribution		75%				55%		74%
Digital Loop Carrier		99%				85%		
Switch		88%				85%		
Interoffice Transport		31%				95%		

COMPANY: Citizen's Telephone Company								
STATE: Missouri								
	Actual		Hatfield Results			BCPM Defaults		
	Fiber	Copper	Defaults	Fiber	Copper	Defaults	Fiber	Copper
Cable Mix - Feeder								
Aerial	0%	0%		26%	57%	6%	8%	0%
Buried	100%	95%		48%	10%	74%	76%	50%
Underground	0%	5%		26%	33%	20%	16%	50%
Cable Mix - Distribution								
Aerial	0%	3%		0%	26%	6%	0%	35%
Buried	100%	95%		0%	74%	74%	0%	61%
Underground	0%	2%		0%	0%	20%	0%	4%
Cable Cost/Foot - Feeder								
Aerial	$ -	$ -		$ 2.12	$ 3.78	$ -	$ 3.28	$ 15.80
Buried	$ 4.12	$ 1.97		$ 23.02	$ 2.09	$ -	$ 3.00	$ 0.02
Underground	$ -	$12.58		$ 1.08	$ 7.14	$ -	$ 3.74	$ 0.02
Cable Cost/Foot - Distribution								
Aerial	$ -	$ 4.00		$ -	$ 1.27	$ -	$ -	$ 3.22
Buried	$ 4.12	$ 1.97		$ -	$ -	$ -	$ -	$ 2.77
Underground	$ -	$12.58		$ -	$ -	$ -	$ -	$ 4.50
Number of Manholes	--	22	n/a			n/a	74	
Number of Cross Connect Box	--	3	n/a			n/a	17	
Number of DLC (Large)	--	1	n/a			n/a	7	
Number of DLC (Small)		3	n/a			n/a	5	
Crossover point	--	none	9000	9000		12000	12000	
Structure Sharing:								
Number of Poles Leased		222	n/a			n/a	0	
Number of Poles Owned		179	n/a			n/a	1315	
% Poles Shared/No. Parties	0%	0	75%	75%		50%	50%	
% Trench Shared/No. Parties	1%	2 or 3	66%	66%		0%	0%	
Fill Rates - Ave. Actual								
Feeder				0%	63%	80%	93%	
Distribution		70%			55%	55%	82%	
Digital Loop Carrier		81%				85%		
Switch		91%				85%		
Interoffice Transport		75%				95%		

COMPANY: Rural Telephone Company								
STATE: Idaho								
	Actual		Hatfield Results			BCPM Defaults		
	Fiber	Copper	Defaults	Fiber	Copper	Defaults	Fiber	Copper
Cable Mix - Feeder								
Aerial	0%	0%		5%	5%	6%	10%	0%
Buried	100%	100%		60%	45%	74%	80%	0%
Underground	0%	0%		35%	50%	20%	10%	0%
Cable Mix - Distribution								
Aerial	0%	0%		0%	75%	6%	0%	39%
Buried	0%	100%		0%	25%	74%	0%	60%
Underground	0%	0%		0%	0%	20%	0%	1%
Cable Cost/Foot - Feeder								
Aerial	$ -	$ -		$ 21.95	$ 2.50	$ -	$ 3.02	$ -
Buried	$ 1.11	$ 1.43		$ 3.34	$ 0.25	$ -	$ 2.76	$ -
Underground	$ -	$ -		$ 0.45	$ 2.60	$ -	$ 3.18	$ -
Cable Cost/Foot - Distribution								
Aerial	$ -	$ -		$ -	$ 0.13	$ -	$ -	$ 2.92
Buried	$ -	$ 1.06		$ -	$ 1.23	$ -	$ -	$ 4.01
Underground	$ -	$ -		$ -	$ -	$ -	$ -	$ 2.51
Number of Manholes	--	0	n/a			n/a	107	
Number of Cross Connect Box	--	5	n/a			n/a	71	
Number of DLC (Large)	--	0	n/a			n/a	16	
Number of DLC (Small)		16	n/a			n/a	11	
Crossover point	--	12 Kft	9000	9000		12000	12000	
Structure Sharing:								
Number of Poles Leased		0	n/a			n/a	0	
Number of Poles Owned		96	n/a			n/a	2919	
% Poles Shared/No. Parties	0%	0	50%	50%		50%	50%	
% Trench Shared/No. Parties	0%	0	66%	66%		0%	0%	
Fill Rates - Ave. Actual								
Feeder		38%				80%	83%	54%
Distribution		85%				55%		69%
Digital Loop Carrier		90%				85%		
Switch		82%				85%		
Interoffice Transport		71%				95%		

COMPANY: Albion Telephone								
STATE: Idaho								
	Actual		Hatfield Results			BCPM Defaults		
	Fiber	Copper	Defaults	Fiber	Copper	Defaults	Fiber	Copper
Cable Mix - Feeder								
Aerial	0%	0%		5%	0%	8%	10%	0%
Buried	0%	0%		60%	0%	77%	80%	0%
Underground	0%	0%		35%	0%	15%	10%	0%
Cable Mix - Distribution								
Aerial	0%	0%		0%	75%	8%	0%	40%
Buried	0%	100%		0%	25%	77%	0%	60%
Underground	0%	0%		0%	0%	15%	0%	0%
Cable Cost/Foot - Feeder								
Aerial	$ -	$ -		$ 22.40	$ -	$ -	$ 2.24	$ -
Buried	$ -	$ -		$ 3.40	$ -	$ -	$ 2.28	$ -
Underground	$ -	$ -		$ 0.46	$ -	$ -	$ 2.03	$ -
Cable Cost/Foot - Distribution								
Aerial	$ -	$ -		$ -	$ 0.17	$ -	$ -	$ 2.24
Buried	$ -	$ 0.36		$ -	$ 1.58	$ -	$ -	$ 1.71
Underground	$ -	$ -		$ -	$ -	$ -	$ -	$ -
Number of Manholes	--	1	n/a			n/a	21	
Number of Cross Connect Box	--	0	n/a			n/a	57	
Number of DLC (Large)	--	0	n/a			n/a	0	
Number of DLC (Small)		2	n/a			n/a	12	
Crossover point	--	12kft	9000	9000		12000	12000	
Structure Sharing:								
Number of Poles Leased		62	n/a			n/a	0	
Number of Poles Owned		191	n/a			n/a	2626	
% Poles Shared/No. Parties	0%	0	50%	50%		50%	50%	
% Trench Shared/No. Parties	0%	0	66%	66%		0%	0%	
Fill Rates - Ave. Actual								
Feeder		80%				80%	100%	33%
Distribution		80%				45%		77%
Digital Loop Carrier		69%				85%		
Switch		88%				85%		
Interoffice Transport		90%				95%		

COMPANY: Trans-Cascade								
STATE: Oregon								
	Actual		Hatfield Results			BCPM Defaults		
	Fiber	Copper	Defaults	Fiber	Copper	Defaults	Fiber	Copper
Cable Mix - Feeder								
Aerial	0%	0%		0	0.45	0.08		
Buried	0%	100%		0	0.05	0.77	no	
Underground	0%	0%		0	0.5	0.15	data	
Cable Mix - Distribution								
Aerial	0%	0%		0	0.75	0.08		
Buried	0%	100%		0	0.25	0.77	no	
Underground	0%	0%		0	0	0.15	data	
Primary Terrain Type								
Cable Cost/Foot - Feeder	$ -	$ -		$ -	$ 2.78			
Aerial	$ -	$ 0.94		$ -	$ 23.40		no	
Buried	$ -	$ -		$ -	$ 0.25		data	
Underground								
Cable Cost/Foot - Distribution	$ -	$ -		$ -	$ 0.09			
Aerial	$ -	$ 0.91		$ -	$ 0.82		no	
Buried	$ -	$ -		$ -	$ -		data	
Underground								
Number of Manholes	--	0	n/a			n/a		
Number of Cross Connect Box	--	5	n/a			n/a	no	
Number of DLC (Large)	--	0	n/a			n/a	data	
Number of DLC (Small)		5	n/a			n/a		
Crossover point	--	12-18Kft	9000	9000		12000	12000	
Structure Sharing:								
Number of Poles Leased		0	n/a			n/a		
Number of Poles Owned		0	n/a			n/a		
% Poles Shared/No. Parties	0%	0	50%	50%		50%	no	
% Trench Shared/No. Parties	0%	0	66%	66%		0%	data	
Fill Rates - Ave. Actual								
Feeder		31%				80%		
Distribution		31%				45%	no	
Digital Loop Carrier		62%				85%	data	
Switch		81%				85%		
Interoffice Transport		not avail				95%		

COMPANY: Dell City								
STATE: Texas								
	Actual		Hatfield Results			BCPM Defaults		
	Fiber	Copper	Defaults	Fiber	Copper	Defaults	Fiber	Copper
Cable Mix - Feeder								
Aerial	0%	0%		3%	0%	6%	9%	0%
Buried	0%	100%		3600%	0%	74%	79%	0%
Underground	0%	0%		61%	0%	20%	12%	0%
Cable Mix - Distribution								
Aerial	0%	0%		0%	75%	6%	0%	39%
Buried	100%	100%		0%	25%	74%	0%	60%
Underground	0%	0%		0%	0%	20%	0%	0%
Cable Cost/Foot - Feeder								
Aerial	$ -	$ -	n/a	$ 1.54	$ -	n/a	$ 2.63	$ -
Buried	$ 0.30	$ 0.78	n/a	$ 3.40	$ -	n/a	$ 2.38	$ -
Underground	$ -	$ -	n/a	$ 0.16	$ -	n/a	$ 2.70	$ -
Cable Cost/Foot - Distribution								
Aerial	$ -	$ -	n/a	$ -	$ 0.16	n/a	$ -	$ 2.70
Buried	$ 0.30	$ 0.78	n/a	$ -	$ -	n/a	$ -	$ 3.05
Underground	$ -	$ -	n/a	$ -	$ -	n/a	$ -	$ 2.28
Number of Manholes	--	0	n/a			n/a	34	
Number of Cross Connect Box	--	0	n/a			n/a	16	
Number of DLC (Large)	--	0	n/a			n/a	0	
Number of DLC (Small)		2	n/a			n/a	4	
Crossover point	--	none	9000	9000		12000	12000	
Structure Sharing:								
Number of Poles Leased		0	n/a			n/a		
Number of Poles Owned		50	n/a			n/a		
% Poles Shared/No. Parties		0%	50%	50%		50%	50%	
% Trench Shared/No. Parties		0%	66%	66%		0%	0%	
Fill Rates - Ave. Actual								
Feeder		80%				80%	67%	33%
Distribution		85%				55%	81%	
Digital Loop Carrier		50%				85%		
Switch		75%				85%		
Interoffice Transport						95%		

COMPANY: Churchill County								
STATE: Nevada								
	Actual		Hatfield Results			BCPM Defaults		
	Fiber	Copper	Defaults	Fiber	Copper	Defaults	Fiber	Copper
Cable Mix - Feeder								
Aerial	16%	28%		5%	5%	0%	9%	22%
Buried	0%	55%		55%	45%	15%	79%	39%
Underground	84%	17%		40%	50%	85%	12%	39%
Cable Mix - Distribution								
Aerial	0%	26%		0%	75%	0%	0%	34%
Buried	0%	67%		0%	25%	15%	0%	62%
Underground	0%	9%		0%	0%	85%	0%	4%
Cable Cost/Foot - Feeder								
Aerial	$ 2.00	$ 2.04	n/a	$ 21.94	$ 24.65	n/a	$ 4.21	$ -
Buried	$ -	$ 1.48	n/a	$ 3.33	$ 3.05	n/a	$ 3.85	$ 0.02
Underground	$ 3.84	$24.99	n/a	$ 0.36	$ 0.69	n/a	$ 4.56	$ 0.08
Cable Cost/Foot - Distribution								
Aerial	$ -	$ 2.04	n/a	$ -	$ 0.37	n/a	$ -	$ 2.91
Buried	$ -	$ 1.48	n/a	$ -	$ 3.21	n/a	$ -	$ 2.54
Underground	$ -	$ 5.82	n/a	$ -	$ -	n/a	$ -	$ 6.33
Number of Manholes	--	95	n/a			n/a	251	
Number of Cross Connect Box	--	232	n/a			n/a	44	
Number of DLC (Large)	--	1	n/a			n/a	11	
Number of DLC (Small)		129	n/a			n/a	29	
Crossover point	--	18 Kft	9000	9000		12000	12000	
Structure Sharing:								
Number of Poles Leased		0	n/a			n/a		
Number of Poles Owned		825	n/a			n/a		
% Poles Shared/No. Parties	15%	2	75%	75%		50%	50%	
% Trench Shared/No. Parties	50%	3	66%	66%		0%	0%	
Fill Rates - Ave. Actual								
Feeder		66%				85%	89%	33%
Distribution		58%				75%		79%
Digital Loop Carrier		75%				85%		
Switch		87%				85%		
Interoffice Transport		85%				0.95		

COMPANY: Siskiyou Telephone								
STATE: California								
	Actual		Hatfield Results			BCPM Defaults		
	Fiber	Copper	Defaults	Fiber	Copper	Defaults	Fiber	Copper
Cable Mix - Feeder								
Aerial	7%	45%		6%	10%	8%	no data	no data
Buried	88%	54%		71%	43%	77%		
Underground	5%	1%		23%	47%	15%		
							no data	no data
Cable Mix - Distribution								
Aerial	0%	45%		0%	75%	8%		
Buried	0%	54%		0%	25%	77%	no data	no data
Underground	0%	1%		0%	0%	15%		
Cable Cost/Foot - Feeder							no data	no data
Aerial	$ 4.17	$ 1.79	n/a	$ 24.50	$ 47.89	n/a		
Buried	$ 3.20	$ 1.74	n/a	$ 3.70	$ 10.58	n/a		
Underground	$ 3.70	$ 7.39	n/a	$ 0.91	$ 1.91	n/a	no data	no data
Cable Cost/Foot - Distribution								
Aerial	$ -	$ 1.82	n/a	$ -	$ 0.29	n/a	no data	no data
Buried	$ -	$ 1.74	n/a	$ -	$ 2.66	n/a		
Underground	$ -	$ 7.39	n/a	$ -	$ -	n/a		
							no data	no data
Number of Manholes	--	9	n/a			n/a		
Number of Cross Connect Box	--	9	n/a			n/a		
Number of DLC (Large)	--	4	n/a			n/a	no data	no data
Number of DLC (Small)		130	n/a			n/a		
Crossover point	--	depends	9000	9000	12000	12000		
							no data	no data
Structure Sharing:								
Number of Poles Leased		4839	n/a			n/a		
Number of Poles Owned		3045	n/a			n/a	no data	no data
% Poles Shared/No. Parties	15%	3	50%	50%		50%	50%	
% Trench Shared/No. Parties	0%	0	66%	66%		0%	0%	
Fill Rates - Ave. Actual								
Feeder		62%				80%	no data	no data
Distribution		17%				45%		
Digital Loop Carrier		76%				85%		
Switch		67%				85%	no data	no data
Interoffice Transport		33%				75%		

COMPANY: Range Telephone								
STATE:								
	Actual		Hatfield Results			BCPM Defaults		
	Fiber	Copper	Defaults	Fiber	Copper	Defaults	Fiber	Copper
Cable Mix - Feeder								
Aerial	0%	0%	0%	4%	5%	6%	10%	0%
Buried	100%	100%		43%	45%	74%	80%	0%
Underground	0%	0%		53%	50%	20%	10%	0%
Cable Mix - Distribution								
Aerial	0%	2%		0%	75%	6%	0%	40%
Buried	0%	98%		0%	25%	74%	0%	60%
Underground	0%	0%		0%	0%	20%	0%	0%
Cable Cost/Foot - Feeder								
Aerial	$ -	$ -	n/a	$ 20.30	$ 31.72	n/a	$ 2.68	$ -
Buried	$ 1.35	$ 0.60	n/a	$ 3.10	$ 3.30	n/a	$ 2.45	$ -
Underground	$ -	$ -	n/a	$ 0.20	$ 0.32	n/a	$ 2.75	$ -
Cable Cost/Foot - Distribution								
Aerial	$ -	$ 3.87	n/a	$ -	$ 0.11	n/a	$ -	$ 2.30
Buried	$ -	$ 0.57	n/a	$ -	$ 1.02	n/a	$ -	$ 1.81
Underground	$ -	$ -	n/a	$ -	$ -	n/a	$ -	$ 3.84
Number of Manholes	--	2	n/a			n/a	330	
Number of Cross Connect Box	--	5	n/a			n/a	132	
Number of DLC (Large)	--	0	n/a			n/a	2	
Number of DLC (Small)		50	n/a			n/a	41	
Crossover point	--	distsens	9000	9000		12000	12000	
Structure Sharing:								
Number of Poles Leased		12	n/a			n/a	0	
Number of Poles Owned		180	n/a			n/a	6145	
% Poles Shared/No. Parties	8%	1	50%	50%		50%	50%	
% Trench Shared/No. Parties	0%	0	66%	66%		0%	0%	
Fill Rates - Ave. Actual								
Feeder		80%				80%	62%	
Distribution		80%				55%		77%
Digital Loop Carrier		80%				85%		
Switch		80%				85%		
Interoffice Transport		80%				95%		

COMPANY: Nehalem Tel & Tel								
STATE: Oregon								
	Actual		Hatfield Results			BCPM Defaults		
	Fiber	Copper	Defaults	Fiber	Copper	Defaults	Fiber	Copper
Cable Mix - Feeder								
Aerial	0%	0%		1%	0%	5%	9%	0%
Buried	0%	100%		9%	0%	70%	78%	0%
Underground	0%	0%		90%	0%	25%	13%	0%
Cable Mix - Distribution								
Aerial	0%	2%		0%	75%	5%	0%	37%
Buried	0%	98%		0%	25%	70%	0%	61%
Underground	0%	0%		0%	0%	25%	0%	2%
Cable Cost/Foot - Feeder								
Aerial	$ -	$ -		$ 75.43	$ -	$ -	$ 2.43	$ -
Buried	$ -	$ 6.55		$ 12.88	$ -	$ -	$ 2.22	$ -
Underground	$ -	$ -		$ 0.11	$ -	$ -	$ 2.64	$ -
Cable Cost/Foot - Distribution								
Aerial	$ -	$ 0.76		$ -	$ 0.55	$ -	$ -	$ 2.48
Buried	$ -	$ 0.63		$ -	$ 5.04	$ -	$ -	$ 2.09
Underground	$ -	$ 7.03		$ -	$ -	$ -	$ -	$ 4.04
Number of Manholes	--	1	n/a			n/a	55	
Number of Cross Connect Box	--	7	n/a			n/a	20	
Number of DLC (Large)	--	0	n/a			n/a	2	
Number of DLC (Small)		15	n/a			n/a	7	
Crossover point	--	0	9000	9000		12000	12000	
Structure Sharing:								
Number of Poles Leased		339	n/a			n/a	0	
Number of Poles Owned		145	n/a			n/a	1138	
% Poles Shared/No. Parties	0%	0	50%	50%		0.5	0.5	
% Trench Shared/No. Parties	0%	0	66%	66%		0	0	
Fill Rates - Ave. Actual								
Feeder		80%				85%	58%	
Distribution		95%				65%		78%
Digital Loop Carrier		90%				85%		
Switch		70%				85%		
Interoffice Transport		0%				95%		

COMPANY: Beaver Creek								
STATE: Oregon								
	Actual		Hatfield Results			BCPM Defaults		
	Fiber	Copper	Defaults	Fiber	Copper	Defaults	Fiber	Copper
Cable Mix - Feeder								
Aerial	0%	0%		1%	0%	5%	8%	0%
Buried	95%	0%		14%	0%	70%	76%	0%
Underground	5%	0%		85%	0%	25%	16%	0%
Cable Mix - Distribution								
Aerial	0%	0%		0%	75%	5%	0%	35%
Buried	0%	99%		0%	25%	70%	0%	62%
Underground	0%	1%		0%	0%	25%	0%	4%
Cable Cost/Foot - Feeder								
Aerial	$ -	$ -	n/a	$ 20.30	$ -	n/a	$ 3.14	$ -
Buried	$ 6.44	$ -	n/a	$ 3.10	$ -	n/a	$ 2.83	$ -
Underground	$ 7.11	$ -	n/a	$ 0.04	$ -	n/a	$ 3.18	$ -
Cable Cost/Foot - Distribution								
Aerial	$ -	$ -	n/a	$ -	$ 0.50	n/a	$ -	$ 2.99
Buried	$ -	$ 0.94	n/a	$ -	$ 4.72	n/a	$ -	$ 2.56
Underground	$ -	$ 6.03	n/a	$ -	$ -	n/a	$ -	$ 4.10
Number of Manholes	--	14	n/a			n/a	49	
Number of Cross Connect Box	--	15	n/a			n/a	9	
Number of DLC (Large)	--	3	n/a			n/a	4	
Number of DLC (Small)		2	n/a			n/a	1	
Crossover point	--	12-18Kft	9000	9000		12000	12000	
Structure Sharing:								
Number of Poles Leased		45	n/a			n/a	0	
Number of Poles Owned		0	n/a			n/a	986	
% Poles Shared/No. Parties	0%	0	66%	66%		50%	50%	
% Trench Shared/No. Parties	0%	0	66%	66%		0%	0%	
Fill Rates - Ave. Actual								
Feeder		78%				85%	42%	
Distribution		77%				65%		83%
Digital Loop Carrier		37%				85%		
Switch		86%				85%		
Interoffice Transport		73%				95%		

COMPANY: Clear Creek Telephone								
STATE: Oregon								
	Actual		Hatfield Results			BCPM Defaults		
	Fiber	Copper	Defaults	Fiber	Copper	Defaults	Fiber	Copper
Cable Mix - Feeder								
Aerial	2%	0%		1%	0%	5%	6%	0%
Buried	90%	73%		7%	0%	70%	74%	0%
Underground	8%	27%		92%	0%	25%	20%	0%
Cable Mix - Distribution								
Aerial	0%	1%		0%	75%	5%	0%	30%
Buried	0%	99%		0%	25%	70%	0%	65%
Underground	0%	0%		0%	0%	25%	0%	5%
Cable Cost/Foot - Feeder								
Aerial	$ 0.36	$ -	n/a	$ 20.30	$ -	n/a	$ 3.04	$ -
Buried	$ 3.41	$ 3.02	n/a	$ 3.10	$ -	n/a	$ 2.75	$ -
Underground	$ 1.26	$ 7.09	n/a	$ 0.02	$ -	n/a	$ 3.10	$ -
Cable Cost/Foot - Distribution								
Aerial	$ -	$ 2.18	n/a	$ -	$ 0.44	n/a	$ -	$ 3.14
Buried	$ -	$ 1.43	n/a	$ -	$ 3.63	n/a	$ -	$ 2.68
Underground	$ -	$ -	n/a	$ -	$ -	n/a	$ -	$ 4.79
Number of Manholes	--	18	n/a			n/a	63	
Number of Cross Connect Box	--	12	n/a			n/a	10	
Number of DLC (Large)	--	5	n/a			n/a	4	
Number of DLC (Small)		4	n/a			n/a	0	
Crossover point	--	12-18Kft	9000	9000		12000	12000	
Structure Sharing:								
Number of Poles Leased		111	n/a			n/a	0	
Number of Poles Owned		5	n/a			n/a	969	
% Poles Shared/No. Parties	100%	1	66%	66%		50%	50%	
% Trench Shared/No. Parties	1%	2	66%	66%		0%	0%	
Fill Rates - Ave. Actual								
Feeder		94%				85%	42%	
Distribution		78%				65%		90%
Digital Loop Carrier		82%				85%		
Switch		99%				85%		
Interoffice Transport		0%				95%		

COMPANY: Clark Fork								
STATE: Montana								
	Actual		Hatfield Results			BCPM Defaults		
	Fiber	Copper	Defaults	Fiber	Copper	Defaults	Fiber	Copper
Cable Mix - Feeder								
Aerial	0%	0%		7%	5%	8%	no data	no data
Buried	100%	0%		80%	45%	77%		
Underground	0%	0%		13%	50%	15%		
							no data	no data
Cable Mix - Distribution								
Aerial	0%	5%		0%	75%	8%		
Buried	0%	94%		0%	25%	77%	no data	no data
Underground	0%	1%		0%	0%	15%		
Cable Cost/Foot - Feeder							no data	no data
Aerial	$ -	$ -	n/a	$ 22.42	$ 41.34	n/a		
Buried	$ 1.92	$ -	n/a	$ 3.40	$ 4.64	n/a		
Underground	$ -	$ -	n/a	$ 1.61	$ 0.51	n/a	no data	no data
Cable Cost/Foot - Distribution								
Aerial	$ -	$ 2.75	n/a	$ -	$ 0.20	n/a	no data	no data
Buried	$ -	$ 1.94	n/a	$ -	$ 1.83	n/a		
Underground	$ -	$ 7.97	n/a	$ -	$ -	n/a		
							no data	no data
Number of Manholes	--	0	n/a			n/a		
Number of Cross Connect Box	--	95	n/a			n/a		
Number of DLC (Large)	--	0	n/a			n/a	no data	no data
Number of DLC (Small)		32	n/a			n/a		
Crossover point	--	24Kft	9000	9000		12000		
							no data	no data
Structure Sharing:								
Number of Poles Leased		2892	n/a			n/a		
Number of Poles Owned		2308	n/a			n/a	no data	no data
% Poles Shared/No. Parties	0%	0	50%	50%		50%		
% Trench Shared/No. Parties	0%	0	66%	66%		0%		
							no data	no data
Fill Rates - Ave. Actual								
Feeder		70%				80%		
Distribution		60%				45%	no data	no data
Digital Loop Carrier		60%				85%		
Switch		85%				85%		
Interoffice Transport		60%				95%	no data	no data

COMPANY: Blackfoot Telephone								
STATE: Montana								
	Actual		Hatfield Results			BCPM Results		
	Fiber	Copper	Defaults	Fiber	Copper	Defaults	Fiber	Copper
Cable Mix - Feeder								
Aerial	0%	0%		60%	44%	5%	10%	36%
Buried	100%	0%		5%	6%	49%	79%	32%
Underground	0%	0%		35%	50%	46%	11%	32%
Cable Mix - Distribution								
Aerial	0%	1%		0%	75%	5%	0%	37%
Buried	0%	99%		0%	25%	49%	0%	61%
Underground	0%	0%		0%	0%	46%	0%	2%
Primary Terrain Type								
Cable Cost/Foot - Feeder								
Aerial	$ -	$ -	n/a	$ 1.87	$ 4.27	n/a	$ 2.52	$ -
Buried	$ 2.49	$ -	n/a	$ 40.73	$ 32.65	n/a	$ 2.29	$ 0.03
Underground	$ -	$ -	n/a	$ 0.46	$ 0.80	n/a	$ 2.70	$ 0.12
Cable Cost/Foot - Distribution								
Aerial	$ -	$ 0.94	n/a	$ -	$ 0.25	n/a	$ -	$ 25.33
Buried	$ -	$ 0.87	n/a	$ -	$ 2.23	n/a	$ -	$ 2.10
Underground	$ -	$ -	n/a	$ -	$ -	n/a	$ -	$ 5.14
Number of Manholes	--	5	n/a			n/a	569	
Number of Cross Connect Box	--	24	n/a			n/a	342	
Number of DLC (Large)	--	1	n/a			n/a	33	
Number of DLC (Small)		15	n/a			n/a	81	
Crossover point	--	24Kft	9000	9000		12000	12000	
Structure Sharing:								
Number of Poles Leased		275	n/a			n/a	0	
Number of Poles Owned		94	n/a			n/a	4058	
% Poles Shared/No. Parties	0%	0	75%	75%		50%	50%	
% Trench Shared/No. Parties	0%	0	66%	66%		0%	0%	
Fill Rates - Ave. Actual								
Feeder		70%				82%	72%	
Distribution		60%				63%		82%
Digital Loop Carrier		60%				85%		
Switch		85%				85%		
Interoffice Transport		60%				95%		

COMPANY: Interior Telephone Company								
STATE: Alaska								
	Actual		Hatfield Results			BCPM Defaults		
	Fiber	Copper	Defaults	Fiber	Copper	Defaults	Fiber	Copper
Cable Mix - Feeder					no data			
Aerial	0%	6%				no data		
Buried	0%	85%					no data	
Underground	0%	9%						no data
Cable Mix - Distribution								
Aerial	0%	6%						
Buried	0%	85%			no data			
Underground	0%	9%				no data		
							no data	
Primary Terrain Type								no data
Cable Cost/Foot - Feeder								
Aerial	$ -	$ 9.28			no data			
Buried	$ -	$ 10.52				no data		
Underground	$ -	$ 1.31					no data	
								no data
Cable Cost/Foot - Distribution								
Aerial	$ -	$ 9.28						
Buried	$ -	$ 10.52			no data			
Underground	$ -	$ 1.31				no data		
							no data	
Number of Manholes	--	0						no data
Number of Cross Connect Box	--	6						
Number of DLC (Large)	--	0						
Number of DLC (Small)		14			no data			
Crossover point	--	none				no data		
							no data	
Structure Sharing:								no data
Number of Poles Leased		262						
Number of Poles Owned		0						
% Poles Shared/No. Parties	0%	0	50%					
% Trench Shared/No. Parties	0%	0	66%		no data			
						no data		
Fill Rates - Ave. Actual							no data	
Feeder		52%						no data
Distribution		52%						
Digital Loop Carrier		70%						
Switch		87%						
Interoffice Transport		none						

COMPANY: Blackfoot Telephone								
STATE: Montana								
	Actual		Hatfield Results			BCPM Defaults		
	Fiber	Copper	Defaults	Fiber	Copper	Defaults	Fiber	Copper
Cable Mix - Feeder								
Aerial	0%	38%		no data				
Buried	0%	4%			no data			
Underground	0%	58%				no data		
							no data	
Cable Mix - Distribution								
Aerial	0%	38%						
Buried	0%	4%						
Underground	0%	58%		no data				
					no data			
Primary Terrain Type						no data		
							no data	
Cable Cost/Foot - Feeder								
Aerial	$ -	$ 13.54						
Buried	$ -	$ 5.51						
Underground	$ -	$ 16.94		no data				
					no data			
Cable Cost/Foot - Distribution						no data		
Aerial	$ -	$ 13.54					no data	
Buried	$ -	$ 5.51						
Underground	$ -	$ 16.94						
Number of Manholes	--	0		no data				
Number of Cross Connect B	--	0			no data			
Number of DLC (Large)	--	0				no data		
Number of DLC (Small)		0					no data	
Crossover point	--	0						
Structure Sharing:								
Number of Poles Leased		301		no data				
Number of Poles Owned		328			no data			
% Poles Shared/No. Parti	54%	1	50%			no data		
% Trench Shared/No. Part	0%	0	66%				no data	
Fill Rates - Ave. Actual								
Feeder		43%						
Distribution		43%		no data				
Digital Loop Carrier		none			no data			
Switch		87%				no data		
Interoffice Transport		none					no data	

Attachment 2