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Federal Communications Commission
Office of Secretary

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)
Access Reform Tariff Filings	)

97-249
97-250

PETITION OF AT&T CORP.
ON RATE-OF-RETURN LEC TARIFF FILINGS

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December 23, 1997

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PETITION OF AT&T CORP.
ON RATE-OF-RETURN LEC TARIFF FILINGS

Pursuant to Section 1.773 of the Commission's Rules, 47 C.F.R. § 1.773, and DA 97-2358,[1] AT&T Corp. ("AT&T") hereby submits this Petition addressed to the tariff filings of the rate-of-return local exchange carriers ("LECs") listed in Appendix A.[2] These tariffs contain numerous deficiencies that warrant, at a minimum, suspension and investigation.[3]

[1] Support Material for Carriers to File to Implement Access Charge Reform Effective January 1, 1997, Order, DA 97-2358, released November 7, 1997.

[2] In addition, this petition requests investigation of the tariffs of other LECs which were required to, but did not, comply with the Commission's Order to file revised tariffs.

[3] A tariff is subject to rejection when it is prima facie unlawful, in that it demonstrably conflicts with the Communications Act or a Commission rule, regulation or order. See, e.g., American Broadcasting Companies, Inc. v. AT&T, 663 F.2d 133, 138 (D.C. Cir. 1980); MCI v. AT&T, 94 F.C.C.2d 332, 340-41 (1983). Suspension and investigation are appropriate where a tariff raises substantial issues of lawfulness. See AT&T (Transmittal No. 148), Memorandum Opinion and Order, 56 RR2d 1503 (1984); ITT (Transmittal No. 2191), 73 F.C.C.2d 709, 716, n.5 (1979) (citing AT&T (Wide Area Telecommunications Service), 46 F.C.C.2d 81, 86 (1974)). Moreover, the Commission has ample authority uner 47 U.S.C. § 208 to investigate a carrier's tariff rates even once they have taken effect.

INTRODUCTORY STATEMENT

The Telecommunications Act of 1996 ("1996 Act") requires LECs to remove implicit subsidies for universal service from their interstate access charges, thereby promoting pricing structures that permit rates to be set closer to the true economic costs of providing interstate access services.[4] The reason for this is clear: Congress intended to encourage competition which would ultimately benefit consumers. To further these goals, the Federal Communications Commission ("Commission") issued the Universal Service Order[5] and Access Reform Order[6] which provide specific rules for LECs to follow in drafting their access tariffs and setting the associated access rates.

For example, to comply with Congress' directive to move towards cost-based rates, the Commission, in the Universal Service Order, has required the removal of the Dial Equipment Minutes ("DEM") weighting support from access charges, substituting for it an explicit support mechanism, Local Switching Support ("LSS"), which is to be funded by the new universal service support mechanism as of January 1, 1998. Universal Service Order ¶¶ 303-304; 47 C.F.R. § 54.301.[7] The Universal Service Order also removes, as of January 1, 1998, Long Term Support ("LTS") from the common line access charge rate structure, substituting instead LTS funds from

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[4] See 47 U.S.C. § 254(e); Telecommunications Act of 1996, Public Law 104-104, Preamble (February 8, 1996).

[5] In the Matter of Federal-State Joint Board on Universal Service, CC Docket No. 96-45 (released May 8, 1997) ("Universal Service Order").

[6] In the Matter of Access Charge Reform, CC Docket No. 96-262, First Report and Order (released May 16, 1997) ("Access Reform Order").

[7] Previously, DEM weighting was an implicit support paid through local switching access charges to study areas with fewer than 50,000 access lines.

the new Universal Service Fund ("USF"). Universal Service Order ¶¶ 305-06, 756-59, 769-71; 47 C.F.R. § 54.303. Finally, that Order permits non-price cap carriers to include their USF contributions in the Carrier Common Line ("CCL") revenue requirement. Universal Service Order ¶ 830.

In addition to the changes required by the Universal Service Order, and in keeping with the principle of cost-causation, the Commission also mandated a number of other changes in the ways non-price cap -- or rate-of-return ("ROR") -- companies recover their rates. Specifically, the Access Reform Order requires that: the Tandem Switching revenue requirement currently in the TIC be reallocated to the Tandem Switching rate element over a two-year period (id. ¶ 218); tandem trunk port and multiplexer costs in the TIC be reallocated to the Tandem Switching rate element (Access Charge Reform, Order on Reconsideration, CC Docket No. 96-262 ¶ 12 (released July 10, 1997)); SS7 costs in the TIC be reallocated to Local Switching (Access Reform Order ¶ 217); host/remote trunking costs in the TIC be reallocated to the Tandem Switched Transport category (id. ¶ 220); and Central Office Equipment ("COE") maintenance expenses be assigned on the basis of the specific type of COE investment being maintained, which in turn requires the transfer of some costs to Local Switching from Common Line, Transport and Special Access. Id. ¶ 223. Additionally, the Access Reform Order (at ¶¶ 63, 206-08) requires exchange carriers to reflect actual average minutes of use ("MOU") in the development of Tandem Switched Transport rates rather than the current surrogate of 9000 MOUs. As a result of this change, the TIC will be reduced by an amount equal to the additional revenues realized from the new, higher Tandem Switched Transport rates.

As shown below, however, many ROR LECs have failed to comply with the Commission's requirements. Specifically, some of them have (1) failed to file revisions to their

existing revenue requirement and rates; (2) insufficiently supported their tariffs with documentation; (3) filed inappropriate revisions to their revenue requirements and rates based on outdated cost studies; and (4) in some cases proposed rates based on inflated TICs and other errors which render the proposed rates unjust and unreasonable. At a minimum, these errors warrant suspension and investigation of the relevant tariffs filed on December 17, 1997, and an immediate investigation into the lawfulness of rates charged by those LECs that have failed to file the required revisions.

I. SEVERAL LECS HAVE FAILED TO FILE ANY REVISIONS TO THEIR EXISTING REVENUE REQUIREMENTS AND RATES, AS REQUIRED BY THE COMMISSION'S ORDERS.

The Commission's Access Reform Order requires all LECs, whether price-cap or rate-of-return, to file new tariffs implementing the changes required by the Commission. A host of LECs, however, failed to file any rate revisions whatsoever. They include South Canaan Telephone Company (PA); Searsboro Telephone Company (IA); Ronan Telephone Company (MT); Rochester Telephone Company (IN); Northwest Telephone-IA (IA); Fairbanks Municipal Utilities System (AK); Cleveland County Telephone Company (AR); Prairie Grove Telephone Company (AR); Vista-United Telecommunications Systems (FL); MCTA, Inc. (NH); City of Brookings Municipal Telephone Department (SD); Roanoke & Botetourt Telephone Company (VA); and Price County Telephone Company (WI). Consequently, the Commission should commence an immediate investigation into the lawfulness of their current rates pursuant to 47 U.S.C. § 208.

II. SEVERAL LECS HAVE FAILED TO PROVIDE SUFFICIENT SUPPORTING DOCUMENTATION.

The Commission should likewise suspend the tariffs of those LECs that have failed to provide the supporting documentation required by the Commission. Specifically, in its TRP Order (at ¶ 13), the Commission required that price cap and rate-of-return carriers include cost studies and workpapers with the tariff filings that summarize the key methods and findings within the cost studies. These workpapers should show the development of cost shifts and methods of reallocation, removal of subsidies, and exogenous cost changes to implement on January 1, 1998. The rules require sufficient information to support results, including (a) a detailed description of study methods; (b) the sources of data; and, (c) detailed investment, capital and operating expense, overhead loadings and other costs used in the cost studies."[8] Many ROR LECs have failed to comply with this directive, falling into one of two categories: (a) those who filed rates without any cost supports whatsoever (Appendix B)[9], and those which filed some cost support, albeit insufficient (Appendix C).[10]

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[8] Tariff Review Plans, DA 97-2345 ¶ 13 (released November 6, 1997) ("TRP Order").

[9] Some LECs which have now submitted some supporting documentation failed to do so in a timely manner. Contoocook Valley (NH) served its cost support today -- the day of the instant filing, making it virtually impossible for AT&T to perform the required analysis needed to determine whether or not rates are just and reasonable. Because of the shortened filing cycle, it is critical that AT&T receive the appropriate cost support on the day that proposed tariffs are filed. Certain LECs did not mail their supporting documentation until at least two days after the ordered filing date. (E.g., Beehive Telephone Company (NV, UT) and Merrimack County Telephone Company (NH)).

[10] Even though these companies provided high level summaries and/or partial Part 36 separations and Part 69 access charge information, the data were insufficient to perform an adequate analysis at the sub-account detail. These data were needed to determine whether or not, for example, the appropriate amount of Local Switching Support had been removed from the Local Switching revenue requirement, or whether or not COE maintenance had been properly reallocated, or whether other TIC charges had been removed to other rate elements.

Especially noteworthy among ROR LECs who failed to file sufficient data is Beehive Telephone Company. Beehive has failed to provide supporting documentation with its proposed tariff rate filing, and it has not attempted to justify the reasonableness of its tariff. Generally, carriers are required to use data which supports their most current filing as a basis for making changes to their revenue requirement, and ultimately their rates. As Beehive's most recent filing is currently under investigation,[11] there is no assurance the rates proposed in the instant filing, albeit a decrease, should not actually be lower. The Commission should therefore suspend Beehive's tariffs and those of the other LECs that have failed to include the appropriate documentation.

III. SEVERAL LECS HAVE INAPPROPRIATELY USED OUTDATED COST STUDIES IN REVISING THEIR REVENUE REQUIREMENTS.

A number of LECs have also relied, inappropriately, upon outdated cost studies in setting their new rates. Under Commission regulations, when LECs apply for tariff changes, carriers whose gross annual revenues exceed $500,000 for the most recent 12 month period of operations must submit a cost of service study for all tariff elements. 47 C.F.R. § 61.38(b)(1), (c) and (d). A cost of service study includes a complete Parts 36 separations and 69 access charges separately identified for the historical and prospective period. These companies must also include complete explanations of the bases for their estimates and submit work papers containing the information underlying the data supplied. 47 C.F.R. § 61.38(b). Unfortunately, several LECs, such as Alltel[12], Anchorage, and Century of Ohio and Wisconsin have not complied with these

[11] Beehive Telephone Company, Transmittal No. 6, CC Docket No. 97-237 (filed July 22, 1997).

[12] Alltel chose not to file rates in June 1997. Instead, it decided to submit proposed changes to its current rates on December 17, 1997.

requirements. Instead, they have filed adjustments to their revenue requirements and rates based on data filed to support their July 1, 1996 annual tariff filings. However, because they did not update their cost studies to reflect their most current costs and demand for ratemaking prior to making changes as required by the Commission's recent universal service and access reform orders, it is unclear whether or not their proposed rates have been set at reasonable levels.[13] Accordingly, the Commission should suspend any tariffs based on such inadequate support.

IV. THE RATES FILED BY SEVERAL LECS ARE BASED UPON INFLATED TRANSPORT INTERCONNECTION CHARGES AND OTHER ERRORS.

With respect to those companies which have filed appropriate documentation, many have filed rates that are nevertheless unjust and unreasonable and fail to comply with the Commission's orders. In addition, AT&T discovered several general rule violations in this set of tariff filings. First, some LECs failed to reallocate host/remote trunking costs from the TIC to the Tandem Switched Transport ("TST") category. Second, some LECs have improperly determined the amount of host remote costs that were to be removed from the TIC to the tandem switched transport rate elements. And third, some LECs have failed to reallocate their Tandem Trunk Port Costs from their TIC to their Tandem Switching Rates, an error that also results in an inflated TIC.

A. Some ROR LECs Failed To Reallocate Host/Remote Trunking Costs From The TIC To The TST Category.

The Commission has explained that the TIC "[a]dversely affects the development of competition in the interstate access market." Access Reform Order ¶ 212. Therefore, the

[13] It is also troublesome that these companies -- which had been consistently over-earning during the period from January 1, 1993 through December 31, 1996 -- decided to maintain their existing inflated rates until now.

Commission has ordered that various charges be removed from the TIC and reallocated to other cost recovery mechanisms. One such reallocation requires ROR carriers to transfer all costs associated with host/remote trunking in the TIC to the TST category. Id. ¶ 220. It appears, however, that Telephone Utilities Exchange Carriers Association ("TUECA"), Pacific Telecom, Inc. ("PTI") and Roseville have understated the amount of host/remote trunking costs to be reallocated, thus inflating the TIC and allowing for an inefficient over-recovery. As TUECA did not provide sufficient explanation as to their reallocation methodology, AT&T utilized data provided within TUECA's cost support to calculate an estimate of the amount that TUECA should have reallocated from the TIC to the TST rate element. TUECA has understated the amount to be reallocated from the TIC by approximately $480,000. This error results in a corresponding TIC overstatement of $480,000 and an understatement of the TST by the same amount.

It also appears Roseville did not remove host/remote trunking costs associated with Cable & Wire Facilities (Acct 2410) as required. This has resulted in an overstatement of the TIC and an understatement of the TST by approximately $140,000.

B. Some LECs Overstated Host/Remote Revenues In Assigning Host/Remote Costs To The Tandem Switched Transport Rate Elements, Tandem Switched Termination Rate, And Tandem Switched Facilities Rate.

Several LECs have major flaws in their determinations of the host remote costs that were ordered to be removed from the TIC to the tandem switched transport rate elements. Puerto Rico Telephone Company ("PRTC") has included an overstated host remote revenue requirement for its host remote COE Cat 4.3 investment and C&WF Cat 4 investment to be redistributed to the tandem switched termination and tandem switched facility rates. This overstatement generated a

corresponding 430% and 62% increase for these two rate elements. The overstatement is attributed to PRTC's development of an annual carrying charge factor based on transmission revenue requirement divided by transmission net plant. However, this factor was applied not to a host remote net plant amount but rather to its plant in service investment, thus overstating the amount of host remote costs to be assigned to the tandem transport rate elements. It would be more appropriate to develop an annual carrying charge factor based on the relationship of interstate revenue requirement to interstate total plant in service (Account 2001). AT&T has determined that the host remote costs that are to be assigned to the tandem switched transport rate elements must be reduced by $3,784,690.

Lafourche Telephone Company added together two years of host remote revenue requirements (1995 and 1996), instead of using the latest year (1996) to develop a revenue adjustment factor used to adjust its tandem switched transport rates. Using this methodology, Lafourche has significantly inflated its revenue adjustment factor and, therefore, doubled its Host/Remote cost recovery in the switched tandem transport rates. The Host/Remote revenue deficiency determined by AT&T is $115,827 in comparison to the $356,257 as filed by Lafourche.

Finally, Hargray Telephone Company and Coastal Utilities appears to have included nearly the entire plant investment amount for host remote COE Cat 4.3 and CWF Cat 4 for the total host remote revenue requirement shown on their respective Schedule 1 worksheets. Using an average annual carrying charge factor of 35%, AT&T has determined that the companies have overstated the host remote cost assignment to the switched tandem transport elements by $644,126 and $74,309 respectively.

C. Roseville Failed To Reallocate Tandem Trunk Port Costs From The TIC To The Tandem Switching Rate Element

It does not appear that Roseville has properly removed its trunk port costs associated with its tandem switching investment from the TIC and assigned those costs to the tandem switching rate. These costs have not been properly identified in its cost support workpapers and must be removed from the TIC.

CONCLUSION

For the reasons stated above, the Commission should suspend for a day and investigate the tariff revisions filed by the rate-of-return LECs identified in this petition.

Respectfully submitted,

AT&T CORP.

/s/ Peter H. Jacoby

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Attorneys for AT&T Corp.

December 23, 1997

APPENDIX A

ROR LECs

LECs Represented by *ICORE, Inc.- Transmittal # 10*
Bloomingdale Home Telephone Company (IN); Buffalo Valley Telephone Company (PA); Mankato Citizens Telephone Company (MN); Merchants & Farmers Telephone Company (IN); Mid-Communications Inc. (MN); Odin Telephone Exchange, Inc.(IL); Wilton Telephone Company (NH); Baraga Telephone Company (MI); Citizens Telephone Company of Kecksburg (PA); Doylestown Telephone Company (OH); Granby Telephone & Telegraph Company (MA); Ironton Telephone Company (PA); Jefferson Telephone Company (SD); McClure Telephone Company (OH); Northwest Iowa Telephone Company (IA); Palmerton Telephone Company (PA); Prairie Grove Telephone Company (AR); Rochester Telephone Company (IN); Ronan Telephone Company (MT); Searsboro Telephone Company (IA); South Canaan Telephone Company (PA)

South Central Telephone - Kiowa (KS) - **Transmittal # 2**
Taconic Telephone Company (NY) - **Transmittal # 28**
Tri-County Telephone Association, Inc. (WY) - **Transmittal # 2**

LECs Represented by *GVNW - Transmittal # 147*
Alhambra-Grantfork Tel.Co. (IL); Ayrshire Farmers Mutual Tel. (IA); C-R Telephone Co. (IL); Cass Telephone Co. (IL); Citizens Tel. Co. (MO); East Ascension Tel. Co. (LA); Egyptian Tel. Coop. Association (IL); El Paso Tel. Co. (IL); Flat Rock Tel. Co. (IL); Grafton Tel. Co. (IL); Gridley Tel. Co. (IL); Home Tel. Co. (IL); Kerman Tel. Co. (CA); La Harpe Tel. Co. (IL); Leaf River Tel. Co. (IL); Madison Tel. Co. (IL); McNabb Tel. Co. (IL); Montrose Mutual Tel. Co (IL); Moultrie Independent Tel. Co. (IL); Oneida Tel. Exchange (IL); Sierra Tel. Co. (CA); Shawnee Tel. Co. (IL); Wabash Tel. Co. (IL); Webb-Dickens Tel. Corp.(IA); West River Telecommunications Coop. (ND); Woodhull Community Tel. Co. (IL); Yates City Tel. Co. (IL); Yelm Tel. Co. (WA); Beaver Creek Coop. Tel. Co. (OR); Price County Tel. Co. (WI); Stayton Coop. Tel. Co. (OR); Table Top Tel. Co., Inc. (AZ); Lake Livingston Tel. Co. (TX)

Allwest (UT) - **Transmittal # 4**
Arkansas Telephone Company (AR) - **Transmittal # 2**
Bay Springs (LA) - **Transmittal # 74**
Beehive Telephone Company (NV, UT) - **Transmittal # 8**
Bixby (OK) - **Transmittal # 3**
Contoocook Valley (NH) - **Transmittal # 3**
DeKalb Telephone Cooperative (TN) - **Transmittal # 2**
Elkart Telephone Company (KS) - **Transmittal # 52**
Etex Telephone (TX) - **Transmittal # 2**
Great Plains Communication (NE) - **Transmittal # 70**

Harrisonville Telephone Company (IL) - **Transmittal # 16 (represented by GVNW)**;
Lexington (NC) - **Transmittal # 4**
Union Telephone Company (WY) - **Transmittal # 65**
Virgin Islands Telephone Corporation (VI) - **Transmittal # 5**

APPENDIX B

LECs Filing No Cost Supports

LECs Represented by *ICORE, Inc.- Transmittal # 10*
Bloomingdale Home Telephone Company (IN); Buffalo Valley Telephone Company (PA); Mankato Citizens Telephone Company (MN); Merchants & Farmers Telephone Company (IN); Mid-Communications Inc. (MN); Odin Telephone Exchange, Inc.(IL); Wilton Telephone Company (NH); Baraga Telephone Company (MI); Citizens Telephone Company of Kecksburg (PA); Doylestown Telephone Company (OH); Granby Telephone & Telegraph Company (MA); Ironton Telephone Company (PA); Jefferson Telephone Company (SD); McClure Telephone Company (OH); Northwest Iowa Telephone Company (IA); Palmerton Telephone Company (PA); Prairie Grove Telephone Company (AR); Rochester Telephone Company (IN); Ronan Telephone Company (MT); Searsboro Telephone Company (IA); South Canaan Telephone Company (PA)

South Central Telephone - Kiowa (KS) - **Transmittal # 2**
Taconic Telephone Company (NY) - **Transmittal # 28**
Tri-County Telephone Association, Inc. (WY) - **Transmittal # 2**

APPENDIX C

LECs Filing Some, But Insufficient, Cost Supports

LECs Represented by *GVNW - Transmittal # 147*

Alhambra-Grantfork Tel.Co. (IL); Ayrshire Farmers Mutual Tel. (IA); C-R Telephone Co. (IL); Cass Telephone Co. (IL); Citizens Tel. Co. (MO); East Ascension Tel. Co. (LA); Egyptian Tel. Coop. Association (IL); El Paso Tel. Co. (IL); Flat Rock Tel. Co. (IL); Grafton Tel. Co. (IL); Gridley Tel. Co. (IL); Home Tel. Co. (IL); Kerman Tel. Co. (CA); La Harpe Tel. Co. (IL); Leaf River Tel. Co. (IL); Madison Tel. Co. (IL); McNabb Tel. Co. (IL); Montrose Mutual Tel. Co (IL); Moultrie Independent Tel. Co. (IL); Oneida Tel. Exchange (IL); Sierra Tel. Co. (CA); Shawnee Tel. Co. (IL); Wabash Tel. Co. (IL); Webb-Dickens Tel. Corp.(IA); West River Telecommunications Coop. (ND); Woodhull Community Tel. Co. (IL); Yates City Tel. Co. (IL); Yelm Tel. Co. (WA); Beaver Creek Coop. Tel. Co. (OR); Price County Tel. Co. (WI); Stayton Coop. Tel. Co. (OR); Table Top Tel. Co., Inc. (AZ); Lake Livingston Tel. Co. (TX)

Allwest (UT) - **Transmittal # 4**
Arkansas Telephone Company (AR) - **Transmittal # 2**
Bay Springs (LA) - **Transmittal # 74**
Beehive Telephone Company (NV, UT) - **Transmittal # 8**
Bixby (OK) - **Transmittal # 3**
Contoocook Valley (NH) - **Transmittal # 3**
DeKalb Telephone Cooperative (TN) - **Transmittal # 2**
Elkart Telephone Company (KS) - **Transmittal # 52**
Etex Telephone (TX) - **Transmittal # 2**
Great Plains Communication (NE) - **Transmittal # 70**
Harrisonville Telephone Company (IL) - **Transmittal # 16 (represented by GVNW)**;
Lexington (NC) - **Transmittal # 4**
Union Telephone Company (WY) - **Transmittal # 65**
Virgin Islands Telephone Corporation (VI) - **Transmittal # 5**

CERTIFICATE OF SERVICE

I, Carl D. Wasserman, do hereby certify that on this 23rd day of December, 1997, I caused a copy of the foregoing Petition of AT&T Corp. on Rate-of-Return LECs Tariff Filings to be served upon the parties listed below by fax.

/s/ Carl D. Wasserman
Carl D. Wasserman

CITED LECs THAT FILED TARIFFS ONLY

COMPANY	STATE	CONTACT	TELEPHONE # VOICE	TELEPHONE # FAX
ICORE				
Bloomingdale Home Telephone Company	IN	S. Ray Vandall	610-967-3944	610-967-5036
Buffalo Valley Telephone Company	PA	S. Ray Vandall	610-967-3944	610-967-5036
Mankato Citizens Telephone Company	MN	S. Ray Vandall	610-967-3944	610-967-5036
Merchants & Farmers Telephone Company	IN	S. Ray Vandall	610-967-3944	610-967-5036
McClure Telephone Company	OH	S. Ray Vandall	610-967-3944	610-967-5036
Mid-Communications Inc.	MN	S. Ray Vandall	610-967-3944	610-967-5036
Odin Telephone Exchange, Inc.	IL	S. Ray Vandall	610-967-3944	610-967-5036
Wilton Telephone Company	NH	S. Ray Vandall	610-967-3944	610-967-5036
Baraga Telephone Company	MI	S. Ray Vandall	610-967-3944	610-967-5036
Citizens Telephone Company of Kecksburg	PA	S. Ray Vandall	610-967-3944	610-967-5036
Doylestown Telephone Company	OH	S. Ray Vandall	610-967-3944	610-967-5036
Granby Telephone & Telegraph Company	MA	S. Ray Vandall	610-967-3944	610-967-5036
Ironton Telephone Company	PA	S. Ray Vandall	610-967-3944	610-967-5036
Jefferson Telephone Company	SD	S. Ray Vandall	610-967-3944	610-967-5036
Northwest Iowa Telephone Company	IA	S. Ray Vandall	610-967-3944	610-967-5036
Palmerton Telephone Company	PA	S. Ray Vandall	610-967-3944	610-967-5036
Prairie Grove Telephone Company	AR	S. Ray Vandall	610-967-3944	610-967-5036
Rochester Telephone Company	IN	S. Ray Vandall	610-967-3944	610-967-5036
Ronan Telephone Company	MT	S. Ray Vandall	610-967-3944	610-967-5036
Searsboro Telephone Company	IA	S. Ray Vandall	610-967-3944	610-967-5036
South Canaan Telephone	PA	S. Ray Vandall	610-967-3944	610-967-5036
All West Communications, Inc	UT	James U. Troup	202-775-7100	202-857-0172
Arkansas Telephone Company, Inc	AR	Thomas J. Moorman	202-296-8890	202-296-8893
Bay Springs	LA	James U. Troup	202-775-7100	202-857-0172
Bixby	OK	James U. Troup	202-775-7100	202-857-0172
Contoocook Valley	NH	B. H. Dickens, Jr. & Gerard J. Duffy	202-659-0830	202-828-5568
Dekalb Telephone Cooperative, Inc.	TN	Larry D. Van Ruler & Donald C. Jackson	719-574-5120	719-574-3050
Elkhart Telephone Company, Inc.	KS	James U. Troup	202-775-7100	202-857-0172
Etex Telephone Cooperative, Inc.	TX	Larry D. Van Ruler & Donald C. Jackson	719-574-5120	719-574-3050
Great Plains Communications, Inc.	NE	Mr. Rodney Thiemann	402-426-6433	402-426-6474
South Central Telephone - Kiowa	KS	Larry D. Van Ruler & Donald C. Jackson	719-574-5120	719-574-3050
Taconic Telephone Corporation	NY	Stephen J. Dumont	518-392-1260	518-392-3290
Tri-County Telephone Association, INC.	WY	Larry D. Van Ruler & Donald C. Jackson	719-574-5120	719-574-3050

CITED LECs THAT FILED TARIFFS ONLY

COMPANY	STATE	CONTACT	TELEPHONE # VOICE	TELEPHONE # FAX
GVI IW				
Alhambra-Grantfork Telephone Company	IL	Thomas J. Moorman & Trey Judy	202-296-8890	202-296-8893
Ayrshire Farmers Telephone	IA	Thomas J. Moorman & Trey Judy	202-296-8890	202-296-8893
C-R Telephone Company	IL	Thomas J. Moorman & Trey Judy	202-296-8890	202-296-8893
Cass Telephone Company	IL	Thomas J. Moorman & Trey Judy	202-296-8890	202-296-8893
Citizens Telephone Company MO	MO	Thomas J. Moorman & Trey Judy	202-296-8890	202-296-8893
East Ascension Telephone Company	LA	Thomas J. Moorman & Trey Judy	202-296-8890	202-296-8893
Egyptian Telephone Cooperative Association	IL	Thomas J. Moorman & Trey Judy	202-296-8890	202-296-8893
El Paso Telephone Company (Illinois)	IL	Thomas J. Moorman & Trey Judy	202-296-8890	202-296-8893
Flat Rock Telephone Cooperative	IL	Thomas J. Moorman & Trey Judy	202-296-8890	202-296-8893
Grafton Telephone Company	IL	Thomas J. Moorman & Trey Judy	202-296-8890	202-296-8893
Gridley Telephone Company	IL	Thomas J. Moorman & Trey Judy	202-296-8890	202-296-8893
Harrisonville Telephone Company	IL	Thomas J. Moorman & Trey Judy	202-296-8890	202-296-8893
Home Telephone Company	IL	Thomas J. Moorman & Trey Judy	202-296-8890	202-296-8893
Kerman Telephone Company	CA	Thomas J. Moorman & Trey Judy	202-296-8890	202-296-8893
La Harpe Telephone Company	IL	Thomas J. Moorman & Trey Judy	202-296-8890	202-296-8893
Leaf River Telephone Company	IL	Thomas J. Moorman & Trey Judy	202-296-8890	202-296-8893
Madison Telephone Company	IL	Thomas J. Moorman & Trey Judy	202-296-8890	202-296-8893
McNabb Telephone Company	IL	Thomas J. Moorman & Trey Judy	202-296-8890	202-296-8893
Montrose Mutual Telephone Company	IL	Thomas J. Moorman & Trey Judy	202-296-8890	202-296-8893
Moultrie Independent Telephone Company	IL	Thomas J. Moorman & Trey Judy	202-296-8890	202-296-8893
Oneida Telephone Exchange	IL	Thomas J. Moorman & Trey Judy	202-296-8890	202-296-8893
Sierra Telephone	CA	Thomas J. Moorman & Trey Judy	202-296-8890	202-296-8893
Shawnee Telephone Company	IL	Thomas J. Moorman & Trey Judy	202-296-8890	202-296-8893
Wabash Telephone Company	IL	Thomas J. Moorman & Trey Judy	202-296-8890	202-296-8893
Webb-Dickens Telephone Corporation	IA	Thomas J. Moorman & Trey Judy	202-296-8890	202-296-8893
West River Telecommunications Cooperative	ND	Thomas J. Moorman & Trey Judy	202-296-8890	202-296-8893
Woodhull Community Telephone Company	IL	Thomas J. Moorman & Trey Judy	202-296-8890	202-296-8893
Yates City Telephone Company	IL	Thomas J. Moorman & Trey Judy	202-296-8890	202-296-8893
Yelm Telephone Company	WA	Thomas J. Moorman & Trey Judy	202-296-8890	202-296-8893
Beaver Creek Coop. Telephone Company	OR	Thomas J. Moorman & Trey Judy	202-296-8890	202-296-8893
Price County Telephone Company	WI	Thomas J. Moorman & Trey Judy	202-296-8890	202-296-8893
Stayton Coop. Telephone Company	OR	Thomas J. Moorman & Trey Judy	202-296-8890	202-296-8893
Table Top Telephone Company, INC.	AZ	Thomas J. Moorman & Trey Judy	202-296-8890	202-296-8893
Lake Livingston Telephone Company	TX	Thomas J. Moorman & Trey Judy	202-296-8890	202-296-8893

CITED LECs THAT FILED TARIFFS ONLY

COMPANY	STATE	CONTACT	TELEPHONE # VOICE	TELEPHONE # FAX
Lexington	NC	James U. Troup	202-775-7100	202-857-0172
Union Telephone Company	WY	Trey Judy	719-594-5829	719-589-0968
Virgin Islands Telephone Corporation	VI	Gregory J. Vogt	202-429-7000	202-429-7049
Merrimack County Telephone Company	NH	B. H. Dickens, Jr. & Gerard J. Duffy	202-659-0830	202-828-5568