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

In the Matter of	)	
Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996	)	CC Docket No. 96-128

PETITION FOR PARTIAL RECONSIDERATION OF THE AMERICAN PUBLIC COMMUNICATIONS COUNCIL

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May 4, 1998

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PETITION FOR PARTIAL RECONSIDERATION OF THE AMERICAN PUBLIC COMMUNICATIONS COUNCIL

The American Public Communications Council ("APCC") hereby petitions for partial reconsideration of the Common Carrier Bureau's Memorandum Opinion and Order, DA 98-642, released April 3, 1998 ("Order"). In this Order, the Bureau prescribed the level of flat-rate dial-around compensation to be paid by some interexchange carriers ("IXCs") for smart payphones for which those IXCs are not yet able to pay per-call compensation.

SUMMARY

APCC requests that the Bureau reconsider two aspects of the Order. First, the Bureau should reconsider its ruling that the level of flat-rate compensation for independent payphone providers during the "waiver period" (from October 7, 1997 until full implementation of payphone-specific ANI digits) should be based on call data from Regional Bell Operating Company ("RBOC") payphones, instead of call data from

independent payphones. The Bureau must require a true-up so that payments to individual payphone providers are based on actual call volumes from those providers' payphones. Second, the Bureau should reconsider its prescription of permanent flat-rate compensation based on only 16 calls per month for payphones in rural areas that are subject to a permanent waiver of the per-call compensation requirement. Based on the attached data from independent payphones flat rate payments to independent payphone providers should be based on the average call volume of 171 calls per payphone per month produced by independent payphones in these areas.

BACKGROUND

The need to extend flat-rate compensation to the "waiver period" results from local exchange carriers' ("LECs'") failure to implement payphone-specific ANI digits for "smart" payphones by the Commission's original deadline of October 7, 1997. The impact of LEC non-compliance falls primarily on independent (non-LEC) payphone service providers ("PSPs"), who are the primary users of the smart payphones for which payphone-specific ANI digits were not provided.[1] In an order released October 9, 1997, the Bureau waived the October 7 deadline and set a new deadline of March 9, 1998 for the LECs to

[1] While virtually all the dumb payphones used by LECs already had payphone-specific ANI digits available, few if any of the smart payphones used by independent payphone providers had such digits by October 9, because LECs had only just begun to accept the fact that they had to implement "FLEX ANI" technology in order to provide payphone-specific ANI digits to smart payphones. Little or no testing of FLEX ANI was conducted prior to October 9. As FLEX ANI began to be deployed and tested, major software glitches were belatedly identified, further delaying the availability of per-call compensation to independent payphone providers.

implement payphone-specific ANI digits. However, the LECs were unable to meet that deadline either. In an order released March 9, 1998, the Bureau set new deadlines for implementation of payphone-specific ANI digits.

Meanwhile, AT&T claimed that, in the absence of payphone-specific ANI digits, it was unable to pay independent payphone providers (as well as some LECs that use "smart" payphones) per-call compensation as contemplated by the Payphone Orders. AT&T requested a waiver that would allow AT&T and similarly situated carriers to pay compensation for the affected payphones on a flat-rate basis instead of a per-call basis until the new deadline(s) for LECs to provide payphone-specific ANI digits. In the April 3 Order, the Bureau granted AT&T's request and prescribed flat-rate compensation to be paid by AT&T and similarly situated carriers.

Independent PSPs' continuing inability to collect dial-around compensation that reflects actual call volumes at independent payphones is of serious concern. The independent payphone industry is already suffering a major financial crisis due to (1) last year's court action overturning the original compensation order, (2) continuing uncertainty over the pending reconsideration and appeal of the current compensation order, and (3) the continued delays in the FCC's promised "true-up" of compensation for the "interim period" (November 1996 – October 1997).

As a result of the prolonged delays in LEC provision of FLEX ANI, and the prescription of a flat-rate methodology, independent payphone providers have not received timely compensation for the fourth quarter of 1997 (due April 1) from AT&T and most

other interexchange carriers ("IXCs"). As of the date this petition is filed, independent PSPs still have not received compensation from most IXCs,[2] and cannot even predict with confidence the amount of compensation they will receive for the fourth quarter of 1997.

DISCUSSION

In addressing the level of flat-rate compensation, APCC urged the Bureau to base the level of compensation for independent payphone providers on record data as to the average monthly volume of dial-around calls received by IPP providers. Comments of APCC, filed October 30, 1997, at 26 ("10/30/97 Comments"); Letter to Mary Beth Richards, Deputy Managing Director, FCC, from Albert H. Kramer, February 27, 1998, at 6-11 ("APCC 2/27 Ex Parte"); Letter to Mary Beth Richards, from Albert H. Kramer, March 5, 1998 ("APCC 3/5 Ex Parte"). Alternatively, if the Bureau used a different methodology to set the initial level of compensation, APCC urged the Bureau to require a true-up among carriers and payphone providers after ANI digits are fully implemented and affected carriers have complete data on the average volume of calls from independent "smart" payphones. 10/30/97 Comments at 30-32; Letter to Magalie Salas from Robert F. Aldrich, March 26, 1998. APCC submitted extensive information detailing various

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[2] The Commission required IXCs paying per-call compensation to pay 4Q97 compensation by April 1, and required IXCs paying flat-rate compensation to pay 4Q97 compensation by April 30 (with interest if paid after April 1). As of April 30, of the "Big Four" IXCs, only one – MCI – have made any significant payments to independent payphone providers. Of the other carriers, only a handful have paid any 4Q97 compensation.

alternative ways to ensure that compensation reflected call volumes from independent payphone providers.

The Bureau declined to prescribe a flat-rate methodology based on call volumes from independent payphones. Instead, the Bureau required a carrier electing to pay flat-rate compensation to pay a flat rate based on the average number of calls the carrier receives from RBOC payphones. Order, ¶¶ 28-29. The Bureau reasoned that record evidence as to the difference between average call volumes at RBOC and independent payphones did not show a significant difference.

The Bureau also declined to rely on call volumes from independent payphones in prescribing call volumes for two classes of independent payphones that are subject to indefinite waivers of the per-call compensation requirement. These payphones consist of payphones served by non-equal access areas and those served by small LECs qualifying for a permanent waiver of ANI digit obligations. For these payphones, the Bureau prescribed flat-rate compensation based on a different methodology – but one that is also based on LEC payphone data rather than independent payphone data. Based on very limited data on 300 rural payphones owned by two LECs, the Bureau prescribed flat-rate compensation for the affected payphones for an indefinite period based on an estimated total dial-around call volume of 16 calls per payphone per month. Order, ¶¶ 30-32.

For the reasons stated below, the Bureau's decision not to utilize independent payphone provider data must be reconsidered.

I. WAIVER PERIOD COMPENSATION OF INDEPENDENT PAYPHONE PROVIDERS SHOULD BE BASED ON CALL DATA FROM INDEPENDENT PAYPHONES

The Bureau must reconsider its decision that final flat-rate compensation payments for independent payphones for the waiver period should be based on average call volumes recorded by IXCs from RBOC payphones. The Bureau decided to prescribe flat-rate compensation on this basis "because such call volume information is available to each IXC and provides a reasonable surrogate for independent payphone call volumes during the waiver period." Order, ¶ 28. The Bureau's reasoning is flawed for several reasons.

First, the record shows there is a significant difference between call volumes at RBOC and independent payphones. Second, there is a means to ensure that compensation more accurately reflects actual call volumes, by requiring a true-up based on the call volumes ultimately reported for each independent payphone.

A. RBOC Payphone Call Volumes Are Significantly Different from Independent Payphone Call Volumes

The record does not support the Bureau's conclusion that call volumes recorded by IXCs from RBOC payphones are a reasonable surrogate for estimating call volumes from independent payphones. The RBOCs estimated that, during the fourth quarter of 1997, their dumb payphones produced an average of 141 calls per payphone per month. Letter to Magalie Salas from Michael K. Kellogg, March 27, 1998. By contrast, APCC's most recent survey, covering the year 1997, showed that independent payphones are

producing an average of 159 calls per payphone per month.[3] Letter to Magalie Salas from Robert F. Aldrich, March 26, 1998 ("APCC 3/26 Ex Parte"). Thus, independent payphones are producing at least 13.5% more dial-around calls, on average, than RBOC payphones.

Furthermore, the level of flat-rate compensation is based on RBOC-payphone call volumes recorded by IXCs, *not* the call volumes reported by the RBOCs. Based on the record to date, the call volumes recorded by IXCs appear to be substantially lower than those reported by the RBOCs. Specifically, AT&T has reported that its average call volumes from RBOC dumb payphones are 44 calls per payphone per month – significantly less than the average of 52 AT&T calls per payphone per month reported by the RBOCs. RBOC 3/27 Ex Parte. Thus, the comparison conducted by the Bureau does not reflect the surrogate that is actually being used for payment of flat-rate compensation. The difference between the surrogate actually being used by – i.e., the number of dial-around calls recorded by AT&T and other IXCs as originating from RBOC dumb payphones – and the record data on independent payphone company calls appears to be far greater than the Order suggests.

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[3] The Bureau did not find that this data is unreliable or unrepresentative of independent payphones. Indeed, APCC submitted extensive information demonstrating that the methods used to gather the data were objective, and that the sample included a wide variety of types of locations and the full range of geographic areas where independent payphones are provided. A{CC 3/26 Ex Parte. In a footnote to the order, the Bureau describes MCI's objections to APCC's study. APCC's 3/26 Ex Parte fully addressed and refuted all the arguments raised by MCI. Order, n.83. APCC's survey data on independent payphone call volumes was cited for various purposes by numerous parties on all sides of the proceeding.

B. Payments to Independent PSPs Based on RBOC Call Volumes Must Be Subject to True-Ups Based on Actual Call Counts from Individual Independent PSPs

The Bureau should reconsider and require a true-up by the carriers and PSPs once ANI digits are fully implemented and carriers have a full set of call volume data for independent payphones. Under the true-up approach, compensation payments for each affected independent payphone would be adjusted, after payphone-specific ANI digits have been implemented, based on the call volumes actually generated from each payphone. The mechanism is easy to administer. In the quarter when the adjustment is made, the carrier simply subtracts the average payment made during the waiver period (based on the average RBOC call volume) from the payment computed for each affected payphone for the period when the true-up occurs. The difference between the two amounts is refunded to the payphone provider (or, if negative, is refunded to the carrier or credited to the carrier's future dial-around payments to that provider).

A true-up would ensure that each PSP is ultimately paid based on actual call volumes from *its own* payphones. Therefore, a true-up provides a more accurate indicator of call volumes from individual PSPs' payphones than a national average of call volumes from a completely different group of RBOC payphones. By enabling each PSP to collect dial-around compensation that reflects the level of calling from its own payphones, a true-up unquestionably provides for more accurate final payments to independent PSPs than any other method proposed – including especially the method actually adopted.

The reasons given for declining to require a true-up lack validity. The Bureau found that a true-up is "not necessary" because "the methodology we have adopted reasonably approximates call volumes for PSP payphones" and because "parties in this proceeding have not provided more specific information on the record that we could use to develop an alternative method of estimating average call volumes." Order, ¶ 35. As shown above, neither of these findings is true. More importantly, however, even if the method based on RBOC call volumes would have been acceptable for determining final payments in other circumstances, it is not acceptable here because a true-up is feasible and unquestionably provides a more accurate and fine-grained determination of flat-rate payments.

Although the Bureau also found that a true-up "would not provide a more valid call volume surrogate than the method we adopt herein," that finding is unsupportable. Indeed, the Bureau does not support its finding except by the general statement that "there is wide variation in payphone call volumes due to such factors as location of the payphone and the month for which volumes are counted." Order, ¶ 35. A true-up is far more valid because it is based on actual call volumes for the particular payphone involved. As to location, a true-up would eliminate all possible errors based on locational variations. Each IXC would true-up its payments for a particular payphone based on the call volumes recorded from that payphone. As to monthly or seasonal variations, those variations can be easily adjusted by the use of seasonal factors derived from APCC's survey data, or alternatively by using seasonal factors derived from RBOC call volume data. In every

important respect, the true-up method is indisputably more accurate than the method chosen by the Bureau.

* * *

For all these reasons, the Bureau must reconsider its decision that final flat-rate compensation payments for independent payphones for the waiver period should be based on average call volumes recorded by IXCs from RBOC payphones. The Bureau should require that compensation payments should be trued-up between flat-rate-paying IXCs and each independent PSP based on the difference between (1) the average RBOC call volumes recorded by the IXC and used for initial payment purposes and (2) the actual call volumes recorded by the IXC at the affected payphones during the first quarter for which the use of FLEX ANI digits is available and required.[4]

II. COMPENSATION FOR INDEPENDENT PAYPHONES SUBJECT TO INDEFINITE WAIVERS OF PER-CALL COMPENSATION SHOULD BE BASED ON ESTIMATES OF CALL VOLUMES FROM INDEPENDENT PAYPHONES

In addition to prescribing flat-rate compensation for payphones subject to time-limited waivers of per-call compensation obligations, the Bureau also addressed compensation for payphones affected by the indefinite waivers of per-call compensation granted to IXCs for payphones served by non-equal access switches and payphones served by LECs that qualify for the "small- to medium-sized LEC" waiver. The Bureau

[4] As mentioned, a seasonal adjustment may be appropriate.

concluded that, because payphones in these categories are in rural areas, they are likely to generate lower call volumes, on average, than other payphones. The Bureau acknowledged, however, that the data in the record supporting this conclusion was limited to two companies and a total of only 300 payphones. The data on which the Bureau relied did not include any data regarding independent payphones. Based on this limited data, the Bureau prescribed compensation for all payphones in these categories at the level of 16 calls per month – roughly 90% less than the average call volumes estimated for payphones generally. The Bureau stated, however, that it would consider revisions to the compensation methodology for these payphones if parties submitted additional record information indicating a different result. Order, ¶¶ 31, 32.

The Bureau's reliance on data from LEC payphones in rural areas as a surrogate for independent payphone call volumes is as flawed in this context as in the context of time-limited waivers. Further, as discussed below, data recently collected by APCC regarding payphones served by small- and medium-sized LECs shows that the disparity between the LEC payphone estimates relied on by the FCC and actual call volumes from independent payphones is extremely great in the context of rural areas.

Previously, APCC was unable to identify call volume data for payphones located in non-equal access areas. However, APCC has reviewed its existing survey data and has collected additional data from its members in order to identify average call volumes from payphones served by small- and medium-sized LECs. This data shows that average calling from independent payphones is an order of magnitude greater than 16 calls per month.

APCC separately calculated average call volumes from two groups of payphones served by small to medium sized LECs. One group consists of all payphones that participated in APCC's existing SMDR survey ("SMDR Project") that are served by small- to medium-sized LECs ("small-LEC-served payphones"). The other group consists of additional small-LEC served payphones owned by various APCC members who conduct business in rural areas, and who were willing and able to submit dial-around calling data on short notice ("General Industry Project"). The methodology and results from the two survey groups are described in Attachment 1.

As shown, the average monthly dial-around calls reported from small-LEC-served independent payphones in the SMDR project is 274. The average monthly dial-around calls reported from small-LEC-served independent payphones in the General Industry Project is 159. The combined average for the survey as a whole is 171 calls per payphone per month. Thus, the data shows that, with respect to independent payphones, dial-around calling volumes in small-LEC-served areas not only far exceeds the Bureau's estimate of 16 calls per month, but it also exceeds the average call volumes reported for independent payphones generally.

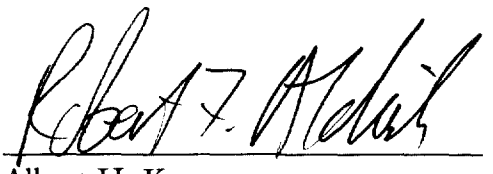
Significantly, the data also shows that dial-around calls total calls represent an unusually high proportion of total calls from these payphones. Therefore, the level of dial-around compensation is an extremely important factor in an independent PSPs' ability to maintain these payphones.

Likely reasons for the disparity in dial-around call volumes for LEC and independent payphones in rural areas are explained in the attached declaration of Mike Miller, President of 4M Communications, Inc., a PSP serving rural Michigan. LECs serving rural areas often receive significant subsidies from federal high-cost funds. As a result, these LECs' payphone operations are substantially less affected by market forces. The LECs appear to have weaker incentives to maintain payphones in higher-traffic locations or to ensure that their payphones are easily accessible and well-maintained. In the experience of Mr. Miller and other independent PSPs serving rural areas, independent PSPs are more likely to serve the high-volume locations in rural areas served by small LECs than in other areas.

Whatever the reasons, there is clearly a great disparity between the LEC payphone estimates relied on by the Bureau and the call volumes reported from independent payphones. In prescribing flat-rate dial-around compensation for independent payphones that are served by non-equal access areas or by LECs qualifying for a small LEC waiver, therefore, the Bureau should rely on data that indicates call volumes from independent payphones, not call volumes from LEC payphones. Based on the attached data, compensation for independent payphones affected by these LEC waivers should be set based on the average volume of 171 calls per payphone per month reported by independent PSPs.

Dated: May 4, 1998

Respectfully submitted,



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ATTACHMENT 1

APCC Industry Statistics
Small LEC Service Area Study
May 4, 1998

In order to demonstrate call traffic patterns for payphones located in small and medium-sized local exchange carrier (LEC) service areas, including LECs serving non-equal access areas, the American Public Communications Council (APCC) collected call data from two groups of members—participants in the previously established SMDR Project and from the newly established General Data Project.

A small or medium-sized LEC is a LEC that is not a Class A or Tier 1 LEC. APCC obtained a list of Class A telephone carriers (or LECs) reporting to the FCC for the year ended December 31, 1996. Any LEC not on this list was determined by APCC to be a small or medium-sized LEC.

SMDR Project

The SMDR Project is the data collection project described in the March 26, 1998 letter from APCC Counsel Robert Aldrich of Dickstein, Shapiro, Morin & Oshinsky to Magalie Salas, Secretary of the Federal Communications Commission (FCC). Calling data from payphones served by small and medium-sized LECs was submitted by six SMDR Project participants operating payphones in nine states and in 37 small and medium-sized LEC service areas. APCC defined a completed call for this project by setting an acceptable duration for each type of call: greater than 60 seconds for calls to numbers known to be access codes (including prepaid card numbers), and greater than one second for calls to subscriber 800 numbers.

SMDR Project participants were asked to identify their payphones located in small and medium-sized LEC areas. A list of the LECs and the specific payphones were provided to APCC's administrative offices. The exact call records for these specific payphones were isolated from the general submission for each participant for each month of the fourth quarter of 1997. Each month of call data for the call records from small and medium-sized LECs was processed with PDRS software in order to determine the number of completed coin calls and dial around calls per month per company for these areas. Within Excel, statistics were developed for each company showing month-by-month average call counts per payphone. Average monthly calling statistics for all of the companies for the fourth quarter of 1997 were developed by aggregating call data from project participants and averaging the call count totals for the quarter over the total of the number of payphones reporting data for each month of the quarter.

General Data Project

The General Data Project is comprised of call data from other APCC members serving a substantial number of rural areas who agreed to submit call data specifically available from small and medium-sized LECs. The General Data Project data was submitted from nine companies operating payphones in 32 states and in 128 small and medium-sized LEC service areas. The APCC defined a completed call for this project by adopting the same definition as used by the RBOC Payphone Coalition for its dial around results for the fourth quarter of 1997--a call lasting greater than 45 seconds.

General Data Project participants were asked to identify their payphones located in small and medium-sized LEC areas. A list of the following information was provided by each participant to APCC's administrative offices: the small or medium-sized LECs, specific payphones located in these LEC service areas, the types of calls included within the results, number of attempts to dial around numbers, and the number of calls to dial around numbers.

Within Excel, statistics were developed for each company showing month-by-month average of dial around attempts and dial around calls per payphone. Average statistics for all of the companies for each month in the fourth quarter of 1997 were developed by aggregating call data from project participants and averaging the total for the quarter over the total number of payphones reporting data for the quarter.

APCC Industry Statistics
Combined Project Results
Small LEC Service Area Study

Industry Statistics		**4Q97 Results**	
	ANIs	Dial Around Calls	*Avg. Dial Around Calls per Month*
1997			
October	801	155,034	*194*
November	788	126,198	*160*
December	1022	166,462	*163*
Totals	***2,611***	***447,694***	***171***
Note:	**Dial Around Call Types include 800, 888, 10XXX, 101XXXX, and 950**		

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Industry Statistics
SMDR Project Results
Small LEC Service Area Study

Payphones in LEC Areas:

Alabama	**North Carolina**	**Wisconsin**
Butler Telephone Co.	North State Telephone Co.	Richland-Grant Tel. Coop.
Gulf Telephone Co.	Alltel of North Carolina	PTI Communication
		TDS Telecom
California	**South Dakota**	Union Telephone Co.
		Citizens Telephone Coop.
Citizens Utility of California	Dakota Cooperative Telecom	Frontier Comm.--St. Croix
	Sioux Valley Telephone Co.	Somerset Telephone Co.
Colorado	Union Telephone Co.	Wittenberg Telephone Co.
	Fort Randall Telephone Co.	Clear Lake Telephone Co.
PTI Communications	Splitrock Telecom Coop.	Amery Telephone Co.
	Brookings Telephone Co.	Siren Telephone Co.
Mississippi	Beresford Municipal Telephone Co.	Wood County Telephone Co.
	Sanborn Telephone Coop.	Farmers Ind. Telephone Co.
Southeast Mississippi Telephone Co.		Frontier Comm. of Wisconsin
	Vermont	Baldwin Telecom
Minnesota		Tri-County Telephone Coop.
	Vermont Telephone Co.	Spring Valley Telephone Co.
Frontier Communications		Chequamegon Telephone Coop.
		West Wisconsin Telecom Coop.
		Frontier Comm. of Mondovi

Industry Statistics
SMDR Project Results
Small LEC Service Area Study

Industry Statistics		**4Q97 Results**		
Average per ANI				
Year/Month	***9710***	***9711***	***9712***	***3-mo. Avg.***
No. of ANIs	*93*	*97*	*97*	*96*
Call Counts				
Coin calls subtotal	149.9	119.9	126.7	132.2
Dial Around calls subtotal	322.3	251.0	249.8	274.4
Access Code calls	68.0	51.0	47.2	55.4
950-XXXX calls	0.7	0.5	0.5	0.6
Toll-Free Subscriber calls	247.3	194.5	197.1	213.0
Prepaid Card calls	6.3	5.0	5.0	5.4

Industry Statistics
SMDR Project Results
Small LEC Service Area Study

Industry Statistics		**4Q97 Results**			
	No. of ANIs	No. of Coin Calls	*Avg. Coin Calls*	No. of Dial Around Calls	*Avg. Dial Around*
1997			*Per Month*		*Calls per Month*
October	93	13,941	*150*	29,974	*322*
November	97	11,630	*120*	24,347	*251*
December	97	12,290	*127*	24,231	*250*
Totals	***287***	***37,861***	***132***	***78,552***	***274***

General Data Project Results
Small LEC Service Area Study
List of LECs

Alabama	Minnesota	North Dakota	Tennessee
Frontier Communications	Arrowhead	Dakota Central	Millington Telephone Co.
Millry Telephone	Blue Earth Valley Telephone Co.	Dickey Rural Telephone Co.	Tennessee Telephone
	Consolidated Telephone Co.	Dickey Rural Coop.	
Arizona	East Otter Tail Telephone Co.	Inter Community Telephone	**Texas**
	Frontier Communications	Midstate Telephone Co.	
Arizona Telephone Co.	Garden Valley	Minot Telephone Co.	Alltel
Century Telephone Co.	Hutchinson Telephone	North Dakota Telephone	Century Telephone
Jacillita Telephone Co.	Johnson	NW Communications Coop.	Big Bend Telephone Co.
Table Top Telephone Co.	Loretel	Polar Communications	Lufkin-Conroe Telephone Exchange
TDS Telecom	Paul Bunyun	Red River Telecom	
Valley Telephone Co.	Peoples	Reservation Telephone Co.	**Utah**
	PTI Communications	Souris River Telephone Co.	
California	TDS Telecom	SRT Communications	Emery Telephone Co.
	West Central Telephone	Turtle Mountain Communications	South Central Utah Telephone Co.
Evans Telephone	Wickstrom		
		Ohio	**Vermont**
Colorado	**Montana**		
		Germantown Independent Telephone	Champlain Valley Telecom
Century Telephone Co.	PTI Communications		Northland Telephone Co.
Columbine Telephone Co.		**Oklahoma**	Shoreham Telephone Co.
PTI Communications	**Nebraska**		TDS Telecom
		Pine Telephone Co.	Vermont Telephone Co.
Georgia	Great Plains Communications		Waitsfield Telecom
		Oregon	
Citizens Telephone	**Nevada**		**Virginia**
Darien Telephone		Canby Telephone	
Nelson Ball Ground	Moapa Valley Telephone	Cascades Utilities	Shenandoah Telephone Co.
	Rio Virgin Telephone	Molial Telephone	Roanoke & Botetourt
Idaho		Oregon Telephone	
	New Hampshire	Pioneer Telephone	**Washington**
Fremont Telecom		PTI Communications	
Project Mutual Telephone	Bretton Woods Telephone Co.	Stayton Coop.	Ellensburg Telephone Co.
			Kalama Telephone
Iowa	**New Mexico**	**South Carolina**	PTI Communications
			TDS Telecom
Frontier Communications	Century Telephone Co.	Chester Telephone Co.	Tenino Telephone
	Eastern New Mexico Telephone Co.	Farmers Telephone Co.	Toledo Telephone
Kentucky	Western Telephone Co.	Horry Telephone Co.	Yelm Telephone
		Lancaster	
Logan Telephone Coop.	**North Carolina**	Pond Branch Telephone Co.	**West Virginia**
		Rock Hill	
Louisiana	Atlantic Telephone		Armstrong Telephone Co.
	Concord Telephone	**South Dakota**	Citizens Telecom
Century Telephone	Lexington Telephone Co.		
LaFourche Telephone	Mebtel	Cheyenne River Sioux Tribal	**Wisconsin**
	North State Telephone Co.	Golden West Telecommunications	
Michigan	Pineville Telephone Co.	Kadoka Telephone Co.	Century Telephone
	Skyline Telephone Coop.	Mobridge Telecommunications	Mid Plains Telephone
Ace	Surry Telephone Co.	Splitrock	
Blanchard	Yadkin Valley Telephone Coop.	Stateline Telecommunications	**Wyoming**
Century Telephone Co.	Wilkes Telephone Coop.	Venture Communications	
Frontier			RT Communications
Kaleva			Silver Star Communications
Shiawasee			Tri County Telephone West, Inc.
Springport			Union Telephone Co.

5/4/98

Industry Statistics
General Data Project Results
Small LEC Service Area Study

Industry Statistics			**4Q97 Results**			
	No. of ANIs	**No. of Dial Around**	***Avg. Dial Around***	**No. of Dial Around Calls**	***Avg. Dial Around***
1997		**Attempts**	***Attempts per Month***	**>45 Secs.***	***Calls per Month***
October	**708**	**165,373**	***234***	**125,060**	***177***
November	**691**	**135,836**	***197***	**101,851**	***147***
December	**925**	**183,688**	***199***	**142,231**	***154***
Totals	***2,324***	***484,897***	***209***	***369,142***	***159***
Note:	**Dial Around Call Types include 800, 888, 10XXX, 101XXXX, and 950**				
	***Calls considered completed at > 45 seconds, except for Company E = > 60 seconds**				

ATTACHMENT 2