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NOTICE OF EX PARTE

November 4, 2014

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, Room 4-C330
Washington, DC 20554

Re: *Rural Call Completion*, WC Docket No. 13-39

Dear Ms. Dortch:

On November 3, 2014, Jeb Benedict, Mary Retka, Ken Shomaker, and Jason Topp of CenturyLink spoke by telephone with Randy Clarke, Richard Hovey, Daniel Kahn, and John Visclosky of the Wireline Competition Bureau. The purpose of the call was to discuss issues related to reporting of data for the FCC Order 13-135, Appendix C, in the above-captioned docket.

The Commission's rules (codified at 47 C.F.R. § 64.2101(h)) call for updated, annual lists of rural and non-rural Operating Company Numbers (OCN) from the National Exchange Carrier Association (NECA). CenturyLink and other service providers are to utilize these lists to determine whether particular calls are rural or non-rural for reporting purposes under the rules. In an October 10 telephone call (summarized in an October 15, 2014 ex parte letter), CenturyLink had raised some concerns about reporting of the data and, for long distance traffic, the need to know the coverage of particular OCNs. This is especially important where there are mismatches between NECA's listing of rural and non-rural OCNs and the Local Exchange Routing Guide (LERG) OCN data used for routing traffic. Since the October 10 conference call, CenturyLink had continued analyzing the data, striving to minimize the number of problem OCNs.

CenturyLink advised that the large majority of the NECA OCNs could be mapped appropriately, matching the LERG OCN information. For 100 cases where the NECA OCN did not match to the LERG 6 OCN, CenturyLink was able to match the NECA OCN to the LERG 6 OCN using the LERG 1 Overall OCN (OOCN). CenturyLink added that it has discussed this process with NECA representatives, who CenturyLink understood agreed with that approach to ensure

accurate reporting. CenturyLink added that the NECA representatives had also said reporting carriers should use the NECA Combined Entity Company Code (CECC) in mapping the NECA OCN to the LERG 6 OCN. CenturyLink said it believes this approach is reasonable, and it encouraged the Commission to ensure all reporting entities receive clear instructions for mapping of OCNs necessary to report their long distance traffic consistently. CenturyLink recommended that the Commission's reporting instructions include not only the NECA OCN list but also the associated OOCN and NECA CECC.

CenturyLink explained that there were mismatches between the NECA OCN list (using the most recent list from NECA's website, dated February 13, 2014) and the LERG data in three categories. These were (1) missing designation or rural and non-rural, (2) border situations, and (3) OCNs that should not require reporting. CenturyLink provided the Bureau staff with a spreadsheet quantifying them, which it reviewed during the call.

> Missing Designation of Rural and Non-rural. For these OCNs, CenturyLink walked through the first three pages of a spreadsheet: labeled "LERG 1 OCNs not on the NECA list," "LERG 6 OCNs not on the NECA list," and "Examples." CenturyLink pointed out that traffic to these OCNs will need to be reported, and thus a designation as "rural" or "non-rural" will need to be provided.
>
> Border Situations. Where a covered area is multi-state, but the switch resides in one state, as shown in the LERG 6 switch CLLI code, or the location state in LERG 6 differs from the NECA OCN list, CenturyLink walked through the next two pages of the spreadsheet. CenturyLink said that clear instructions will be needed so that traffic to these locations is reported to the appropriate state. CenturyLink suggested that LERG 6 Location State and Switch CLLI information should be used to determine the appropriate state for that OCN.
>
> OCNs that Should Not Require Reporting. CenturyLink next walked through the last page of the spreadsheet. These OCNs are for Canadian or Reserved Codes. These should be excluded from call completion reporting. CenturyLink suggested that this also be made clear in reporting instructions.

CenturyLink emphasized that, if these "mismatches" are not addressed, data could be reported inconsistently among service providers, could be left unreported, or could be reported incorrectly. These conditions could lead to wasted resources at regulatory authorities and providers through unnecessary investigations, and they could needlessly undermine confidence in reported data. By clarifying the appropriate way to handle such OCNs, the Commission can help all providers put in place processes that ensure call completion data is reported in an appropriate and uniform way.

Pursuant to Section 1.1206(b) of the Commission's rules, a copy of this notice is being filed in the appropriate docket.

Sincerely,

/s/ John E. Benedict

Copy via email to:
Randall Clarke
Richard Hovey
Daniel Kahn
John Visclosky

TAB 1

LERG 1 Not in NECA List

LERG 1 Not in NECA List		
OCN	Overall OCN	OCN Name
0158		BRDGWATER-CANISTOTA IND TEL DBA GOLDEN WEST TELECM
0236	0250	NORTH RIVER TELEPHONE COOPERATIVE
0275	0275	ARDMORE TEL CO INC.
0279	0279	GTC, INC.
0281	0281	VERIZON NORTH INC.
0318	0318	FRONTIER COMMUNICATIONS OF THE SOUTH, LLC
0332		BRAZOS TELECOMMUNICATIONS, INC.
0407	0479	VERIZON SOUTH INC.-KY
0410		VERIZON SOUTH INC.-KY (CONTEL)
0479	0479	VERIZON SOUTH INC.
0497		PIEDMONT TELEPHONE MEMBERSHIP CORP.
0567	0567	UNITED TELEPHONE - SOUTHEAST
0568	0568	HIGHLAND TELEPHONE COOPERATIVE, INC.
0580	0580	NORTH CENTRAL TELEPHONE COOPERATIVE, INC.
0584		YORKVILLE TELEPHONE COOPERATIVE
0669		ALLENDALE TELEPHONE CO.
0682	0682	FRONTIER COMMUNICATIONS OF MICHIGAN, INC.
0692		DRENTHE TELEPHONE CO.
0720		PENINSULA TELEPHONE CO.
0910		MILLTOWN MUTUAL TELEPHONE CO.
1180	1180	VALOR TELECOMMUNICATIONS LLC
1186	1186	VERIZON NORTH INC.
1223		LAUREL TELEPHONE COMPANY, INC.
1268	1268	WINNEBAGO COOP. TELEPHONE ASSN.
1281	1281	ACE TELEPHONE ASSOCIATION
1304		SWISHER TELEPHONE CO.
1317	1317	UNITED TELEPHONE OF EASTERN KANSAS DBA CENTURYLINK
1333	1333	IAMO TELEPHONE CO.
1349	1349	WOLVERTON TEL CO
1359	1359	HILLS TELEPHONE CO., INC.
1403		FEDERATED TELEPHONE COOPERATIVE
1405	1359	ALLIANCE COMMUNICATIONS COOPERATIVE, INC. - IA

1406	1359	ALLIANCE COMMUNICATIONS COOPERATIVE, INC. - MN
1423		RUNESTONE TEL. ASSN DBA RUNESTONE TELECOM ASSO.
1444	1444	INTERSTATE TELECOM. COOP., INC.
1452	1452	MABEL COOP TEL CO
1595	1595	UNITED TEL. CO. OF THE WEST
1622		MOORE & LIBERTY TELEPHONE CO.
1633	1633	RED RIVER RURAL TEL. ASSN.
1637	1637	WEST RIVER TELECOMMUNICATIONS COOPERATIVE
1640		ARMOUR INDEPENDENT TEL CO DBA GOLDEN WEST TELCOMM
1642		ALLIANCE COMMUNICATIONS COOPERATIVE, INC. (BALTIC)
1667		KADOKA TEL CO DBA GOLDEN WEST TELECOMMUNICATIONS
1673		BEK COMMUNICATIONS, INC.
1677		SIOUX VALLEY TEL DBA GOLDEN WEST TELECOMMUNICATION
1679		STOCKHOLM - STRANDBURG TELEPHONE CO.
1681		DICKEY RURAL COMMUNICATIONS, INC.
1682		TRI-COUNTY TELCOM, INC.
1684		UNION TEL. CO. DBA GOLDEN WEST TELECOMMUNICATIONS
1686		VIVIAN TEL CO DBA GOLDEN WEST TELECOMMUNICATIONS
1789	1789	KS ST. TEL. DBA VERIZON MIDWEST INC.
1790	1790	CONTEL OF KANSAS, INC.DBA GTE SYSTEMS OF ARKANSAS
1819		CLASSIC TELEPHONE, INC.
1846		GTE-MW DBA VERIZON MW INC.-MO (CONTEL SYS.)
1883	1789	KS ST. TEL. DBA VERIZON MIDWEST INC. (EAST MO)
1891	1891	CRAW - KAN TELEPHONE COOPERATIVE, INC.
1922		GTE-MW DBA VERIZON MW INC.-MO (CONTEL)
1957	1957	EMBARQ MISSOURI, INC. DBA CENTURYLINK
2000	2000	EMBARQ FLORIDA, INC.
2045		NRPT COMMUNICATIONS
2047		CRAWFORD TEL CO
2066	2066	DELL TELEPHONE COOPERATIVE, INC.
2080	2080	GTE-SW DBA VERIZON SW INC.
2177	2177	CONTEL OF THE WEST DBA GTE OF THE WEST
2223	2223	CENTURYTEL OF THE GEM STATE, INC DBA CENTURYLINK
2233	2233	RURAL TELEPHONE CO.

2275	2275	NAVAJO COMM CO INC. DBA FRONTIER NAVAJO COMM CO
2302	2302	VERIZON CALIFORNIA INC.
2315		GLOBAL VALLEY NETWORKS
2342		CITIZENS TELECOM DBA FRONTIER COMM OF TOULUMNE
2381	2381	CENTURYTEL OF THE SOUTHWEST, INC.
2395	5775	CENTURYTEL OF OREGON DBA CENTURYLINK
2400	2400	UNITED TELEPHONE - NORTHWEST
2416	2416	FRONTIER COMMUNICATIONS NORTHWEST INC.
3027		ALASCOM, INC. DBA AT&T ALASKA
3302	3302	ALL WEST COMMUNICATIONS, INC.
3400	3400	FRONTIER COMMUNICATIONS CORPORATION
3402		CITIZENS TELECOMM DBA FRONTIER COMM GOLDEN STATE
4313	1186	GTE MW DBA VERIZON MIDWEST INC.-MO (GTE)
4331	0479	VERIZON SOUTH INC.-AL
4424	0281	VERIZON SOUTH INC.-AL
4440	2226	MIDVALE TELEPHONE EXCHANGE, INC. - OR
4478	0281	VERIZON SOUTH INC.-TN
5110		BELL ATLANTIC
5775	5775	CENTURYTEL SVCS GROUP INC DBA CENTURYLINK SVCS GRP
6179		DICKEY RURAL ACCESS, INC.
9100		VERIZON COMMUNICATIONS
9200		VERIZON COMMUNICATION
9300		AMERITECH
9400		BELLSOUTH TELECOMMUNICATIONS, INC.
9600		QWEST CORPORATION
9700		PACIFIC BELL REGION
280D	1359	ALLIANCE COMMUNICATIONS COOPERATIVE, INC. - SD
423F	423F	NORHTERN NEW ENGLAND TELOPS LLC DBA FAIRPOINT COMM
597B	597B	WEST KENTUCKY RURAL TELEPHONE COOPERATIVE, INC.
864F		VERIZON SOUTH, INC. - NC (CONTEL)

TOTAL = 96 LERG 1 OCNs not on the NECA list

TAB 2

LERG 6 Not in NECA List

LERG 6 Not in NECA List		
OCN	Overall OCN	OCN Name
0236	0250	NORTH RIVER TELEPHONE COOPERATIVE
0497		PIEDMONT TELEPHONE MEMBERSHIP CORP.
0669		ALLENDALE TELEPHONE CO.
0692		DRENTHE TELEPHONE CO.
0720		PENINSULA TELEPHONE CO.
0910		MILLTOWN MUTUAL TELEPHONE CO.
1304		SWISHER TELEPHONE CO.
1403		FEDERATED TELEPHONE COOPERATIVE
1405	1359	ALLIANCE COMMUNICATIONS COOPERATIVE, INC. - IA
1406	1359	ALLIANCE COMMUNICATIONS COOPERATIVE, INC. - MN
1423		RUNESTONE TEL. ASSN DBA RUNESTONE TELECOM ASSO.
1622		MOORE & LIBERTY TELEPHONE CO.
1640		ARMOUR INDEPENDENT TEL CO DBA GOLDEN WEST TELCOMM
1642		ALLIANCE COMMUNICATIONS COOPERATIVE, INC. (BALTIC)
1667		KADOKA TEL CO DBA GOLDEN WEST TELECOMMUNICATIONS
1677		SIOUX VALLEY TEL DBA GOLDEN WEST TELECOMMUNICATION
1679		STOCKHOLM - STRANDBURG TELEPHONE CO.
1682		TRI-COUNTY TELCOM, INC.
1684		UNION TEL. CO. DBA GOLDEN WEST TELECOMMUNICATIONS
1686		VIVIAN TEL CO DBA GOLDEN WEST TELECOMMUNICATIONS
2315		GLOBAL VALLEY NETWORKS
2342		CITIZENS TELECOM DBA FRONTIER COMM OF TOULUMNE
2395	5775	CENTURYTEL OF OREGON DBA CENTURYLINK
3027		ALASCOM, INC. DBA AT&T ALASKA
3400	3400	FRONTIER COMMUNICATIONS CORPORATION
3402		CITIZENS TELECOMM DBA FRONTIER COMM GOLDEN STATE
9300		AMERITECH
280D	1359	ALLIANCE COMMUNICATIONS COOPERATIVE, INC. - SD
864F		VERIZON SOUTH, INC. - NC (CONTEL)

TOTAL = 29 LERG 6 OCNs not on the NECA list

TAB 3

LERG 6 Not in NECA Example

OCN	OCN NAME	CATEGORY	LOC STATE	SWITCH	AOCN	BLOCK ID
1640	ARMOUR INDEPENDENT TEL CO DBA GOLDEN WEST TELCOMM	ILEC	SD	BRWRSDXADS1	G014	A
280D	ALLIANCE COMMUNICATIONS COOPERATIVE, INC. - SD	ILEC	MN	VYSPSDXA755	G104	A
280D	ALLIANCE COMMUNICATIONS COOPERATIVE, INC. - SD	ILEC	SD	BRNDSDXA582	G104	A
280D	ALLIANCE COMMUNICATIONS COOPERATIVE, INC. - SD	ILEC	SD	LRWDIAXO474	G104	A

TAB 4

LERG 6 Border State Concerns

LERG 6 Border State Concerns		
OCN	Overall OCN	OCN Name
0084		TACONIC TELEPHONE CORP.
0089		DEPOSIT TELEPHONE CO., INC.
0096		CITIZENS TELECOMM CO OF NY DBA FRONTIER COMM OF NY
0099		HANCOCK TELEPHONE CO. NY
0248		SCOTT COUNTY TELEPHONE COOPERATIVE, INC.
0254		CENTRAL TEL. CO. OF VIRGINIA DBA CENTURYLINK
0277	0277	WEST SIDE TELEPHONE CO.
0280	0275	ARDMORE TELEPHONE CO., INC.
0291	0279	GTC, INC. - FL
0294	0279	GTC, INC. - AL
0324		VALLEY TELEPHONE CO., LLC
0371		KNOLOGY OF THE VALLEY, INC.
0381		PUBLIC SERVICE TELEPHONE CO.
0421	597B	WEST KENTUCKY RURAL TELEPHONE COOP. CORP., INC.
0431	5775	CENTURYTEL NORTHWEST LOUISIANA INC DBA CENTURYLINK
0452		DELTA TELEPHONE CO., INC.
0472		FAIRPOINT COMMUNICATIONS MISSOURI, INC.
0501		SKYLINE TELEPHONE MEMBERSHIP CORP.
0552	5775	CENTURYTEL OF ADAMSVILLE DBA CENTURYLINK-ADAMSVILL
0615	1186	FRONTIER NORTH, INC. - OH
0695		FRONTIER NORTH, INC. - MI
0832		UNITED TEL. CO. OF INDIANA, INC. DBA CENTURYLINK
0848		BERGEN TELEPHONE CO. - WISCONSIN
0946		SHARON TELEPHONE CO. - WISCONSIN
0950	5775	CENTURYTEL NW WISCONSIN LLC DBA CENTURYLINK
1036		FRONTIER NORTH, INC. - IL
1109		HEARTLAND TELECOM COMPANY OF IOWA DBA ENVENTIS
1123		CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
1126	5775	CENTURYTEL OF CHESTER, INC. DBA CENTURYLINK
1128		CITIZENS TELECOM OF NE LLC DBA FRONTIER COM OF NE
1142	5775	CENTURYTEL NW AR-RUSSELVL DBA CENTURYLINK-RUSSELLV
1143	5775	CENTURYTEL NW AR DBA CENTURYLINK - SILOAM SPRINGS

1163	1180	VALOR TELECOMM TX, LP-TX #1 DBA WINDSTREAM COMM SW
1167		WINDSTREAM IOWA COMMUNICATIONS, INC. - NORTH
1178		WINDSTREAM IOWA COMMUNICATIONS, INC.
1181	1180	VALOR TELECOMM TX, LD-TX #2 DBA WINDSTREAM COMM SW
1183		CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL
1259		NORTHERN IOWA TELEPHONE CO.
1338	1268	WINNEBAGO COOP. TELEPHONE ASSN. - MINNESOTA
1345	1281	ACE TELEPHONE ASSOCIATION - MINNESOTA
1346	1281	ACE TELEPHONE ASSOCIATION - IOWA
1358		BLUE EARTH VALLEY TELEPHONE CO.
1367		FRONTIER COMMUNICATIONS OF MINNESOTA, INC.
1389		FARMERS MUTUAL TELEPHONE CO.
1401		HALSTAD TELEPHONE CO.
1404		HARMONY TELEPHONE CO.
1421	1452	MABEL COOPERATIVE TELEPHONE CO. - MINNESOTA
1424	1452	MABEL COOPERATIVE TELEPHONE CO. - IOWA
1443		LORETEL SYSTEMS, INC.
1485		SPRING GROVE COMMUNICATIONS
1495		VALLEY TELEPHONE CO.
1509	1349	WOLVERTON TELEPHONE CO. - ND
1525		THREE RIVER TELEPHONE COMPANY
1540		DILLER TELEPHONE CO.
1557		HARTMAN TELEPHONE EXCHANGE, INC.
1568		WINDSTREAM NEBRASKA, INC.
1576		NORTHEAST NEBRASKA TELEPHONE CO.
1577		GREAT PLAINS COMMUNICATIONS, INC.
1607		CONSOLIDATED TELCOM
1611		DICKEY RURAL TELEPHONE COOPERATIVE
1630		POLAR COMMUNICATIONS MUTUAL AID CORP.
1631	1633	RED RIVER RURAL TEL ASSN DBA RED RIVER COMM - ND
1632		RESERVATION TELEPHONE COOPERATIVE
1638		MIDSTATE COMMUNICATIONS, INC.
1651	1444	INTERSTATE TELECOM. COOP., INC. - SOUTH DAKOTA
1654	1444	INTERSTATE TELECOM. COOP., INC. - MINNESOTA

1657		ALLIANCE COMM. COOPERATIVE, INC. (SPLIT ROCK)
1659		GOLDEN WEST TEL COOP INC DBA GOLDEN WEST TELECOMM
1662		RC COMMUNICATIONS, INC.
1664		JAMES VALLEY COOPERATIVE TELEPHONE COMPANY
1674		ROBERTS COUNTY TELEPHONE COOPERATIVE ASSN.
1680		VENTURE COMMUNICATIONS COOPERATIVE
1689		WEST RIVER COOPERATIVE TELEPHONE COMPANY
1724		SOUTHWEST ARKANSAS TELEPHONE COOPERATIVE, INC.
1727	5775	CENTURYTEL OF SOUTH ARKANSAS, INC. DBA CENTURYLINK
1746		BLUE VALLEY TELE-COMMUNICATIONS, INC.
1759	1891	CRAW - KAN TELEPHONE COOPERATIVE, INC. - MISSOURI
1764		ELKHART TELEPHONE CO., INC.
1785		J.B.N. TELEPHONE CO., INC.
1811	1957	EMBARQ MISSOURI, INC. - MO DBA CENTURYLINK
1817		PIONEER TELEPHONE ASSOCIATION, INC.
1818	1891	CRAW - KAN TELEPHONE COOPERATIVE, INC. - KANSAS
1826		RURAL TEL. SERVICE CO., INC. DBA NEX-TECH
1827		S & T TELEPHONE COOPERATIVE ASSOCIATION
1841		UNITED TELEPHONE ASSOCIATION, INC.
1866		OZARK TELEPHONE CO.
1885		WINDSTREAM MISSOURI, INC.
1888	1888	GRAND RIVER MUTUAL TELEPHONE CO.
1945		SENECA TELEPHONE CO.
1988		DOBSON TELEPHONE CO.
2016		PANHANDLE TELEPHONE COOPERATIVE, INC.
2030	2030	TOTAH COMMUNICATIONS, INC.
2176	2176	VALLEY TELEPHONE COOPERATIVE, INC.
2196		PEETZ COOPERATIVE TELEPHONE CO.
2200	2200	FORT MOJAVE TELECOM, INC.
2214		COLUMBINE TELCO DBA SILVER STAR COMMUNICATIONS
2226	2226	MIDVALE TELEPHONE EXCHANGE, INC.
2235		BLACKFOOT TELEPHONE COOPERATIVE, INC.
2246		MID-RIVERS TELEPHONE COOPERATIVE, INC.
2247	2247	NEMONT TELEPHONE COOPERATIVE, INC.

2250		PROJECT TELEPHONE CO., INC.
2251	2251	RANGE TELEPHONE COOPERATIVE, INC.
2286		SOUTH CENTRAL UTAH TELEPHONE ASSOCIATION, INC.
2291		DUBOIS TELEPHONE EXCHANGE, INC.
2295	2295	SILVER STAR TELEPHONE CO., INC.
2297		UNION TELEPHONE CO. - WY
2319		VERIZON CALIFORNIA INC.-CA (GTE)
2356		RIO VIRGIN TELEPHONE CO., INC.
2360	5775	CENTURYTEL OF OREGON, INC. DBA CENTURYLINK
2390	2390	OREGON - IDAHO UTILITIES, INC.
2423	2423	INLAND TELEPHONE CO.
2455		BENKELMAN TELEPHONE CO., INC.
3304		HUMBOLDT TELEPHONE COMPANY
3316		NORTHLAND TELEPHONE OF MAINE, INC.
3333		COPPER VALLEY TELEPHONE, INC.
3410		RT COMMUNICATIONS
3411		TCT WEST, INC.
3700		MICRONESIAN TELECOMMUNICATIONS CORP.
3900		AMERICAN SAMOA TELECOMMUNICATIONS AUTHORITY ASTCA
4001	0580	NORTH CENTRAL TELEPHONE COOPERATIVE, INC. - KY
4002	0568	HIGHLAND TELEPHONE COOPERATIVE, INC. - KY
4300	1633	RED RIVER RURAL TEL ASSN DBA RED RIVER COMM - MN
4321	2416	FRONTIER COMMUNICATIONS NORTHWEST, INC. - ID
4324	2416	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA
4414	1637	WEST RIVER TELECOMMUNICATIONS COOPERATIVE - SD
4419		FRONTIER COMMUNICATIONS OF THE SOUTHWEST INC - AZ
4433	2066	DEL TELCORP INC. - NM
4437	2223	CENTURYTEL GEM STATE INC-ID DBA CENTURYLINK - ID
4450	2275	NAVAJO COMM CO INC NM DBA NAVAJO COMM CO NM
4451	2275	NAVAJO COMM CO INC - UT DBA NAVAJO COMM UT
4511	0567	UNITED TELEPHONE-SOUTHEAST-VA DBA CENTURYLINK-VA
4531	1595	UNITED TEL CO WEST - WY DBA CENTURYLINK WEST - WY
5111	423F	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM - ME
5113	423F	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM - NH

5115		TELEPHONE OP CO OF VERMONT DBA FAIRPOINT COMM-VT
9102	9102	VERIZON NEW ENGLAND INC.
9104	9104	VERIZON NEW YORK, INC.
9206	9206	VERIZON NEW JERSEY, INC.
9212	9212	VERIZON MARYLAND, INC.
9213	9213	VERIZON VIRGINIA, INC.
9329	9329	AMERITECH ILLINOIS
9348	9348	CINCINNATI BELL, INC.
9417	9417	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL
9419	9419	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL
9533	9533	SOUTHWESTERN BELL
9631	9631	QWEST CORPORATION
9636	9636	QWEST CORPORATION
9638	9638	QWEST CORPORATION
9740	9740	PACIFIC BELL
127G		FRONTIER COMMUNICATIONS OF VIRGINIA, INC. - VA
598B	597B	WEST KENTUCKY RURAL TELEPHONE COOPERATIVE, INC.

TOTAL = 151 LERG 6 OCNs with border State concerns

TAB 5

Border State Examples

NECA List Data					LERG 6 Data						
STATE	**OCN**	**Key 1**	**Company Name**	**NECA List**	OCN	OCN NAME	CATEGORY	LOC STATE	SWITCH	AOCN	BLOCK ID
FL	0291	FL0291	GTC, Inc. - FL	Rural	0291	GTC, INC. - FL	ILEC	FL	FLRLALXADS0	423F	A
FL	0291	FL0291	GTC, Inc. - FL	Rural	0291	GTC, INC. - FL	ILEC	GA	CHTHFLXADS0	423F	A
OH	0615	OH0615	Frontier North, Inc. - OH	Non-Rural	0615	FRONTIER NORTH, INC. - OH	ILEC	OH	FTWYINXA35T	3400	A
OH	0615	OH0615	Frontier North, Inc. - OH	Non-Rural	0615	FRONTIER NORTH, INC. - OH	ILEC	MI	SYVNOHXADS0	3400	A

TAB 6

Canada or Reserved Code List

Canada or Reserved Code list

OCN	Overall OCN	OCN Name
1212		JEFFERSON TELEPHONE CO.
1968		BEGGS TELEPHONE CO., INC.
1985		CROSS TELEPHONE CO.
5113	423F	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM - NH
8050		BELL QUEBEC
8051		BELL ONTARIO
8082		CITY WEST CABLE AND TELEPHONE CORP.
8083		TELUS COMMUNICATIONS (QUEBEC) INC. - QC
8084		TELUS COMMUNICATIONS INC.
8085		NEWFOUNDLAND TELEPHONE CO LTD
8086		TELUS COMMUNICATIONS (B.C.) INC.
8087		ISLAND TELEPHONE COMPANY, LTD.
8088		MANITOBA TELEPHONE SYSTEM
8089		MARITIME TELEPHONE & TELEGRAPH, LTD
8090		NEW BRUNSWICK TELEPHONE CO., LTD
8091		SASKATCHEWAN TELEPHONE COMPANY
8092		NORTHWESTEL, INC.
8202		AMTELECOM, INC.
8203		QUADRO COMMUNICATIONS CO-OPERATIVE INC.
8204		BROOKE TELECOM COOPERATIVE, LTD.
8205		BRUCE TELECOM
8206		COCHRANE TELECOM SERVICES
8208		LA CIE DE TELEPHONE DE COURCELLES INC.
8210		DRYDEN MUNICIPAL TELEPHONE SYSTEM
8211		NEXICOM TELECOMMUNICATIONS INC
8212		GOSFIELD NORTH COMMUNICATIONS CO-OPERATIVE LTD
8213		TELEPHONE GUEVREMONT, INC.
8214		HAY COMMUNICATIONS CO-OPERATIVE LIMITED
8215		HURON TELECOMMUNICATIONS COOPERATIVE, LTD.
8216		EXECULINK TELECOM INC. - ON
8218		BELL ALIANT REGIONAL COMMUNICATIONS LP
8219		CIE DE TELEPHONE DE LAMBTON INC.

8220		LANSDOWNE RURAL TELEPHONE COMPANY LTD.
8221		TELEPHONE MILOT INC.
8223		MORNINGTON COMMUNICATIONS CO-OPERATIVE LIMITED
8225		NORTH FRONTENAC TEL CO. LTD.
8227		NORTH RENFREW TELEPHONE CO.
8228		NORTHERN TEL LIMITED PARTNERSHIP
8229		O.N. TEL INC. DBA ONTERA
8230		NEXICOM TELEPHONES INC.
8231		PEOPLES TEL CO OF FOREST LTD
8232		ROXBOROUGH TELEPHONE COMPANY INC.
8233		LE TELEPHONE ST-EPHREM INC.
8235		LA CAMPAGNIE DE TELEPHONE DE ST-VICTOR
8237		SOGETEL, INC.
8239		TELEBEC, LTEE
8240		TUCKERSMITH COMMUNICATIONS COOPERATIVE, LTD.
8241		LA COMPAGNIE DE TELEPHONE UPTON, INC.
8242		COOPTEL
8244		WESTPORT TELEPHONE CO LTD.
8245		WIGHTMAN TELEPHONE LTD.
9104	9104	VERIZON NEW YORK, INC.

TOTAL = 52 Canadian or Reserved Codes for OCNs not on the NECA list that may need to be disregarded for this effort