

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

In the Matter of	)	
	)	
Connect America Fund	)	WC Docket No. 10-90
	)	
A National Broadband Plan for Our Future	)	GN Docket No. 09-51
	)	
Establishing Just and Reasonable Rates for Local Exchange Carriers	)	WC Docket No. 07-135
	)	
High-Cost Universal Service Support	)	WC Docket No. 05-337
	)	
Developing an Unified Intercarrier Compensation Regime	)	CC Docket No. 01-92
	)	
Federal-State Joint Board on Universal Service	)	CC Docket No. 96-45
	)	
Lifeline and Link-Up	)	WC Docket No. 03-109
	)	
Universal Service Reform – Mobility Fund	)	WT Docket No. 10-208

**EMERGENCY REQUEST FOR EXPEDITED TREATMENT**

**PETITION OF NORTH STATE TELEPHONE COMPANY DBA NORTH STATE  
COMMUNICATIONS, RANDOLPH TELEPHONE MEMBERSHIP CORPORATION,  
AND SKYLINE TELEPHONE MEMBERSHIP CORPORATION FOR LIMITED  
WAIVER OF 47 C.F.R. § 51.917(b)(7)(ii)**

Pursuant to Section 1.3 of the rules of the Federal Communications Commission (“FCC” or “Commission”),<sup>1</sup> North State Telephone Company dba North State Communications (“North State”), Randolph Telephone Membership Corporation (“Randolph”), and Skyline Telephone Membership Corporation (“Skyline”) (jointly referred to herein as the “NC ILEC Petitioners” or

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<sup>1</sup> 47 C.F.R. § 1.3.

the “Petitioners”) hereby request a limited waiver of 47 C.F.R. Section 51.917(b)(7)(ii).<sup>2</sup> As explained herein, the Petitioners seek to include amounts owed by Halo Wireless, Inc. (“Halo”) in Fiscal Year 2011 (FY 2011)<sup>3</sup> in their Base Period Revenues (“BPR”). Exclusion of the amounts owed to the NC ILEC Petitioners in the BPR has a significant adverse impact on the Petitioners’ recovery mechanism funding, which in turn has challenged the Petitioners by limiting their ability to invest in and improve their networks. The NC ILEC Petitioners seek to include these amounts, which were billed to Halo but not collected by March 31, 2012 due to Halo’s bankruptcy, in the BPR effective July 1, 2012. As demonstrated herein, the Commission has good cause to grant the NC ILEC Petitioners’ request, and furthermore grant of this waiver is squarely in the public interest and is the appropriate course of action to meet the objectives of the November 2011 *USF/ICC Transformation Order*. Likewise, the NC ILEC Petitioners’ requested relief herein is similar to the relief that the FCC recently granted, with conditions, for another similarly situated group of providers.<sup>4</sup> The NC ILEC Petitioners respectfully request emergency expedited attention to this matter.

## I. BACKGROUND

The NC ILEC Petitioners are rural incumbent local exchange carriers (“RLEC”) operating within rural areas of North Carolina. While the NC ILEC Petitioners vary somewhat in size, they all provide high quality voice and broadband telecommunications services to their customers and are providers of last resort throughout their designated study areas in North Carolina. Collectively,

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<sup>2</sup> *Id.* at 51.917(b)(7)(ii).

<sup>3</sup> Defined as October 1, 2010 to September 30, 2011.

<sup>4</sup> See *Connect America Fund et al.*, WC Docket No. 10-90 *et al.*, Order, FCC 14-121 (rel. Aug. 7, 2014) (“*TDS Waiver Order*”).

the NC ILEC Petitioners have been deprived of \$323,829.72 that would have been included in their annual BPR but for Halo's access avoidance efforts and subsequent bankruptcy.

**North State Telephone Company dba North State Communications**, located in High Point, North Carolina, is one of the oldest telephone companies in the nation and has been providing telecommunications services since 1895. North State is one of the nation's 15 largest integrated communications companies. North State provides a full range of telecommunications services. The company's reach extends over a broad area of the Piedmont Triad Region of North Carolina, including the communities of High Point, Thomasville, Archdale, Randleman, Jamestown, Trinity, Greensboro and Kernersville.

North State requests a BPR adjustment of \$120,311.68 associated with billed, but not collected, terminating intrastate access revenues for services provided to Halo Wireless during FY 2011.

**Randolph Telephone Membership Corporation**, a Cooperative located in Asheboro, North Carolina and founded in 1954, provides advanced telecommunications services for over 12,000 subscribers. Randolph Telephone Membership Corporation's service territory includes eight (8) exchanges spanning 645 square miles and parts of seven (7) counties in central North Carolina. Randolph Telephone Membership Corporation's service area consists of primarily rural agricultural communities.

Randolph requests a BPR adjustment of \$15,875.57 associated with billed, but not collected, terminating intrastate access revenues for services provided to Halo Wireless during FY 2011.

**Skyline Telephone Membership Corporation**, a Cooperative located in northwest North Carolina and northeast Tennessee, was founded in 1951. Skyline's service territory includes twelve

(12) exchanges, which span five (5) counties in two (2) states and spans over 800 square miles. Skyline provides advanced telecommunications services for over 26,000 rural residential and business subscribers. The residential subscribers consist of a mix of part-time seasonal, agriculturally based, and low-income rural subscribers. Skyline's business subscribers are small rural businesses and are sparsely located and typically only have one or two access lines and broadband service.

Skyline requests a BPR adjustment of \$187,642.47 associated with billed, but not collected, terminating intrastate access revenues for services provided to Halo Wireless during FY 2011.

The NC ILEC Petitioners serve high-cost, rural, remote, and challenging areas of the North Carolina consisting of low-income areas with some of the Petitioners located in extremely rugged hilly and mountainous terrain. The NC ILEC Petitioners strive to deliver modern and reliable communications services to customers that would likely have no (or very few) alternative providers. They also rely on predictable and sufficient Universal Service Fund ("USF") support and intercarrier compensation ("ICC") mechanisms to deliver quality voice and data services at reasonable costs to consumers. Given the NC ILEC Petitioners remote and challenging service areas, predictable and sufficient support is imperative to their ability to continue providing quality services at reasonable costs—the series of events described herein undermines and frustrates their mission.

The events described below have produced a recurring penalty for the NC ILEC Petitioners, as they will never receive the amounts owed by Halo *and* the negative annual impact on the NC ILEC Petitioners' recovery mechanism funding puts them in a precarious position where seeking relief from the Commission is the only viable option left at this point. The Petitioners were victims of Halo's access arbitrage scheme, the impact of which is further amplified by their

inability to include the amounts billed to Halo in their BPR, leaving them deprived of both the intrastate revenue that they should have collected from Halo and fairly assessed recovery mechanism funding going forward. The NC ILEC Petitioners are utilizing the Commission's waiver process to seek fairly assessed recovery mechanism funding so that the damage caused by Halo's unpaid intrastate intercarrier compensation charges does not reoccur every year, consistent with a recent decision by the Commission related to similarly situated providers.<sup>5</sup>

The NC ILEC Petitioners initially began terminating Halo's traffic in late 2010 or early 2011, and then began billing Halo for terminating intrastate access traffic pursuant to the rates, terms and conditions set forth in the applicable intrastate access tariffs.<sup>6</sup> Halo subsequently refused to pay all such terminating intrastate access charges to each Petitioner. Halo erroneously argued that because it was a CMRS provider, all of its traffic delivered to the NC ILEC Petitioners was intraMTA CMRS and that no compensation was due for transport and termination of its traffic, which resulted in numerous disputes with ILECs that have been documented extensively in FCC and various state commission proceedings. In the *USF/ICC Transformation Order*, the FCC rejected Halo's claim that its traffic was intraMTA CMRS, stating "[w]e clarify that a call is considered to be originated by a CMRS provider for purposes of the intraMTA rule only if the calling party initiating the call has done so through a CMRS provider;" and "we agree with NECA that the 're-origination' of a call over a wireless link in the middle of the call path does not convert a wireline-originated call into a CMRS-originated call for the purposes of reciprocal compensation and we disagree with Halo's contrary position."<sup>7</sup>

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<sup>5</sup> See *TDS Waiver Order*.

<sup>6</sup> As further addressed below, Petitioners requested BPR adjustments are limited to billed, but not collected, revenues for FY 2011.

<sup>7</sup> See *Connect America Fund et al., WC Docket No. 10-90 et al., Report and Order and Further Notice of Proposed Rulemaking*, FCC 11-161 (rel. Nov. 18, 2011) ("*USF/ICC Transformation Order*"), *pets. for review denied, Direct*

To further aggravate the difficulties in collecting billed intercarrier compensation fees from Halo, it appears that Halo's estate lacks assets to pay the amounts owed to the NC ILEC Petitioners that were harmed. While the Petitioners have filed both pre-petition and post-petition administrative claims in bankruptcy court,<sup>8</sup> they cannot simply get in line and wait for a reasonable settlement because the Commission required that all revenues included in calculating Base Period Revenue had to be collected before March 31, 2012. Accordingly, the negative revenue impact associated with Halo's unpaid debt has ultimately created an unfair annual revenue hit for each of the NC ILEC Petitioners. The Petitioners have no alternative recourse but to seek waivers from the Commission, and as explained below, the Commission has good cause to grant these waivers. Additionally, consistent with the Commission's decision in the *TDS Waiver Order*, the NC ILEC Petitioners meet the requisite conditions in order to make the necessary BRP adjustments, as further outlined below.

## **II. GOOD CAUSE EXISTS TO GRANT THE NC ILEC PETITIONERS' REQUESTED WAIVER**

In general, the FCC's rules may be waived for good cause shown.<sup>9</sup> Waiver is appropriate where the "particular facts would make strict compliance inconsistent with the public interest."<sup>10</sup> The FCC may grant a waiver of its rules where the requested relief would not undermine the policy

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*Comm. Cedar Valley, et al v. FCC 11-161*, No. 11-9900 [www.ca10.uscourts.gov/opinions/11/11-9900.pdf](http://www.ca10.uscourts.gov/opinions/11/11-9900.pdf) (10th Cir. filed May 23, 2014).

<sup>8</sup> See generally Claims Register, *In re: Halo Wireless, Inc.*, Case No. 11-42464, Bkrtcy. E.D. Tex. (converted July 19, 2012) (including pre-petition claims and administrative expense (post-petition) claims filed by Petitioners).

<sup>9</sup> 47 C.F.R. § 1.3.

<sup>10</sup> See *AT&T Wireless Services, Inc. et al. v. Federal Communications Commission*, No. 00-1304 (D.C. Cir. 2001), citing *Northeast Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) ("*Northeast Cellular*").

objective of the rule in question, special circumstances warrant a deviation from the general rule, and such deviation will serve the public interest.<sup>11</sup>

The Commission anticipated that there would be circumstances similar to this where revenues associated with FY 2011 were not able to be collected by March 31, 2012 and allowed for a waiver of the March 31, 2012 deadline in its USF-ICC Transformation Order.<sup>12</sup> Specifically, the Commission stated:

Carriers may, however, request a waiver of our rules defining the Baseline to account for revenues billed for terminating switched access service or reciprocal compensation provided in FY2011 but recovered after the March 31, 2012 cut-off as the result of the decision of a court or regulatory agency of competent jurisdiction. The adjusted Baseline will not include settlements regarding changes after the March 31, 2012 cut-off, and any carrier requesting such modifications to its Baseline shall, in addition to otherwise satisfying the waiver criteria, have the burden of demonstrating that the revenues are not already in its Baseline, including providing a certification to the Commission to that effect. Any request for a waiver should also include a copy of the decision requiring payment of the disputed intercarrier compensation. Any such waiver would be subject to the Commission's traditional "good cause" waiver standard, rather than the Total Cost Earnings Review specified below.

The overall purpose of this waiver petition is consistent as it would allow the NC ILEC Petitioners to include revenues associated with FY 2011 that were billed but not collected due to Halo's deliberate access avoidance scheme (including Halo's bankruptcy) which were beyond the NC ILEC Petitioners' control, as outlined above.

The NC ILEC Petitioners' argument for good cause is furthermore supported by other similar pending and decided waiver petitions by other ILECs that claim to be facing undue hardship as a result of Halo's deliberate attempts to avoid complying with the applicable rules for intercarrier compensation as well as the Commission's recent decision in the *TDS Waiver Order*.

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<sup>11</sup> See generally, *WAIT Radio v. FCC*, 418 F.2d 1153 (D.C. Cir. 1969), *cert. denied*, 409 U.S. 1027 (1972); see also *Northeast Cellular* (D.C. Cir. 1990).

<sup>12</sup> See *USF/ICC Transformation Order* at footnote 1745.

As explained in that Order, TDS Telecommunications Corp. (“TDS Telecom”) filed a petition for a limited waiver “to permit TDS Telecom to include within its BPR unpaid amounts billed to Halo for intrastate usage during FY 2011, thereby rendering those amounts eligible for recovery pursuant to the Commission’s eligible recovery mechanism.”<sup>13</sup> Like each of the NC ILEC Petitioners, TDS Telecom did not expect to collect the amounts it billed to Halo as a result of Halo’s bankruptcy and subsequent liquidation of assets. TDS asserted that “fundamental fairness and the public interest dictate that the Commission waive its rules in this specific scenario,” and the FCC “could not have predicted every permutation through which a carrier such as Halo would develop an elaborate scheme to avoid paying access charges in a way that would have such potential long-term revenue ramifications...due to the nature of the eligible recovery mechanism.”<sup>14</sup> The NC ILEC Petitioners echo these statements and emphasize that the loss created by Halo’s refusal to pay applicable intercarrier compensation charges unfortunately occurred at a time when the FCC was making monumental changes to the USF and ICC mechanisms and therefore constitute good cause in favor of granting the NC ILEC Petitioners’ requested relief.

In conditionally granting TDS Telecom’s petition, the Commission found that “[a]bsent such waivers, the unique combination of Halo’s alleged ‘re-origination’ of intrastate access traffic as CMRS-originated traffic, Halo’s refusal to pay access charges for that traffic, and Halo’s subsequent bankruptcy and corporate liquidation would result in significant reductions to the NC ILEC Petitioners ICC recovery mechanism revenues. Further this impact on recovery amounts

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<sup>13</sup> See Petition of TDS Telecommunications Corp. for Limited Waiver of 47 C.F.R. § 51.917(c), WC Docket No. 10-90 *et al.* (filed Aug. 10, 2012) (“*TDS Petition*”) at 2.

<sup>14</sup> *Id.* at pg. 3-4 and 12.

would continue far into the future, such that the NC ILEC Petitioners would suffer ongoing harm because of Halo's behavior, without some form of Commission action."<sup>15</sup>

The loss imposed on the NC ILEC Petitioners by the combined effects of Halo's unpaid intrastate access charges and the prospect of basing all future years' recovery mechanism funding on a lower amount than it should be based upon is indeed real. Grant of this waiver is in the public interest. The Base Period Revenue is a critical starting point to calculate Eligible Recovery and is part of the transitional recovery mechanism established by the Commission expressly to mitigate the impact of *USF/ICC Transformation Order* on carrier revenues and investments. Grant of this limited waiver would allow the initial calculation of Eligible Recovery to accurately represent the NC ILEC Petitioners' FY 2011 Base Period Revenues. Further, grant of the limited waiver would serve the public interest in that the NC ILEC Petitioners would be able to continue to provide high quality telecommunications services to their customers consistent with the FCC's National Broadband Plan, USF Reform, and IP Transition goals while having the benefit of the transitional recovery mechanism to the full extent intended by the Commission.

### **III. TDS WAIVER ORDER CONDITIONS**

In granting TDS Telecom's waiver petitions, the Commission implemented steps to ensure that providers had diligently pursued recovery of unpaid revenues from Halo by conditionally granting the requested waivers. Specifically, the Commission found that:

Prior to implementation of the relief granted in this Order, each petitioner must certify that: (1) it terminated all intrastate access traffic sent to it by Halo during FY 2011 that it seeks to add to its BPR calculations; (2) it billed Halo intrastate access charges for such traffic during FY 2011; (3) a court or regulatory agency of competent jurisdiction has made a finding of liability regarding the compensation for such traffic; (4) it filed a timely claim in the Halo bankruptcy case requesting compensation for such traffic; and (5) it did not include in its BPR adjustment

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<sup>15</sup> See *TDS Waiver Order* at 4.

amounts any interest, late payment fees, collection fees, or attorney fees. In addition, any BPR adjustment for a study area resulting from this Order shall not exceed the intrastate access portion of a Petitioner's bankruptcy claim for that study area.<sup>16</sup>

As detailed below, the NC ILEC Petitioners hereby certify that they meet each of the above five conditions. The Petitioners terminated all intrastate access traffic sent to it by Halo during FY 2011 that they seek to add to their BPR calculations, and they billed Halo intrastate access charges for such traffic during FY 2011.

Further, a court or regulatory agency of competent jurisdiction has made a finding of liability regarding the compensation for such traffic. North State is a commercial company regulated by the North Carolina Utilities Commission ("NCUC"), while Randolph and Skyline are telephone membership corporations regulated by the North Carolina Rural Electrification Authority ("NCREA"). Both of these regulatory agencies made a finding of liability regarding compensation for the Halo traffic. On September 27, 2012 the NCUC issued an order that found that Halo is liable for access charges on intrastate non-local landline traffic that Halo has sent for termination.<sup>17</sup> In addition, on November 10, 2014, the NCREA issued an order that Halo is liable for billed terminating intrastate switched access charges.<sup>18</sup>

Additionally, the NC ILEC Petitioners filed a timely claim in the Halo bankruptcy case requesting compensation for such traffic the intrastate amounts that Halo owes for FY 2011 and the BPR adjustment for each of the Petitioner's study area does not exceed the intrastate access portion of the bankruptcy claim for that study area.

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<sup>16</sup> *Id.* at 5.

<sup>17</sup> See NCUC *Order Granting Relief*, Docket No. P-55, Sub 1841, issued September 27, 2012.

<sup>18</sup> See NCREA *Order*, Docket No. TMC-8, Sub 1, issued November 10, 2014.

Finally, the NC ILEC Petitioners hereby certify that the BPR adjustments outlined below do not include revenues that are already included in their baseline, including all interstate switched access charges and do not contain any interest, late payment fees, collection fees, or attorney fees.

**IV. REQUESTED RELIEF**

For the reasons stated above, pursuant to Section 1.3 of the Commission’s rule, the NC ILEC Petitioners hereby respectfully requests that the Commission include the following amounts in their Base Period Revenue.

<u>NC ILEC Petitioner:</u>	<u>Base Period Revenue Adjustment:</u>
North State Telephone Company	\$120,311.68
Randolph Telephone Membership Corp.	\$15,875.57
Skyline Telephone Membership Corp.	\$187,642.47

The NC ILEC Petitioners request that these amounts be included retroactively in the Base Period Revenue effective as of July 1, 2012. The NC ILEC Petitioners have shown good cause for the Commission to grant this limited waiver, and urge the Commission to expeditiously address the petition.

Respectfully submitted,

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Filed January 23, 2015

Attachments

North State Telephone Company

FY 2011 Month	MOUs			Composite Rates			Revenues			
	Local	Intrastate	Interstate	Local	Intrastate	Interstate	Local	Intrastate	Interstate	Total
Oct-10	0	0	0	0.00	0.00	0.00	\$0.00	\$0.00	\$0.00	\$0.00
Nov-10	0	0	0	0.00	0.00	0.00	\$0.00	\$0.00	\$0.00	\$0.00
Dec-10	71,567	128,820	276,724	0.00	0.03896	0.026066	\$0.00	\$5,019.34	\$7,213.10	\$12,232.44
Jan-11	142,083	255,749	549,386	0.00	0.03896	0.026066	\$0.00	\$9,964.99	\$14,320.29	\$24,285.28
Feb-11	140,026	252,047	541,435	0.00	0.03896	0.026066	\$0.00	\$9,820.78	\$14,113.05	\$23,933.83
Mar-11	153,481	276,265	593,459	0.00	0.03896	0.026066	\$0.00	\$10,764.40	\$15,469.10	\$26,233.50
Apr-11	167,389	301,301	647,239	0.00	0.03896	0.026066	\$0.00	\$11,739.89	\$16,870.93	\$28,610.82
May-11	163,656	294,580	632,802	0.00	0.03896	0.026066	\$0.00	\$11,478.03	\$16,494.62	\$27,972.65
Jun-11	160,488	288,879	620,555	0.00	0.03896	0.026066	\$0.00	\$11,255.88	\$16,175.38	\$27,431.26
Jul-11	251,984	453,572	974,339	0.00	0.03896	0.026066	\$0.00	\$17,672.97	\$25,397.12	\$43,070.09
8/8/2011 (pre)	83,365	150,057	322,344	0.00	0.03896	0.026066	\$0.00	\$5,846.80	\$8,402.21	\$14,249.01
8/9/2011 (post)	108,746	195,742	420,483	0.00	0.03896	0.026066	\$0.00	\$7,626.89	\$10,960.30	\$18,587.19
Sep-11	272,641	490,753	1,054,211	0.00	0.03896	0.026066	\$0.00	\$19,121.71	\$27,479.06	\$46,600.77

\$0.00    \$120,311.68    \$172,895.16    \$293,206.84

Total Eligible Recovery Amount (Intrastate Terminating)    **\$120,311.68**

Randolph Telephone Membership Corporation

FY 2011 Month	MOUs			Composite Rates			Revenues			
	Local	Intrastate	Interstate	Local	Intrastate	Interstate	Local	Intrastate	Interstate	Total
Oct-10	0	0	0	0.00	0.03460	0.02547	\$0.00	\$0.00	\$0.00	\$0.00
Nov-10	1,393	2,838	2,413	0.00	0.03460	0.02547	\$0.00	\$98.19	\$61.46	\$159.65
Dec-10	9,897	20,124	17,108	0.00	0.03460	0.02547	\$0.00	\$696.29	\$435.77	\$1,132.06
Jan-11	19,412	39,471	33,555	0.00	0.03460	0.02547	\$0.00	\$1,365.70	\$854.70	\$2,220.40
Feb-11	16,611	33,775	28,713	0.00	0.03460	0.02547	\$0.00	\$1,168.62	\$731.37	\$1,899.99
Mar-11	19,124	38,885	33,057	0.00	0.03460	0.02547	\$0.00	\$1,345.42	\$842.02	\$2,187.44
Apr-11	19,308	39,260	33,376	0.00	0.03460	0.02547	\$0.00	\$1,358.40	\$850.14	\$2,208.54
May-11	19,924	40,512	34,440	0.00	0.03460	0.02547	\$0.00	\$1,401.72	\$877.24	\$2,278.96
Jun-11	22,547	45,845	38,973	0.00	0.03460	0.02547	\$0.00	\$1,586.24	\$992.71	\$2,578.95
Jul-11	29,704	60,398	51,346	0.00	0.03460	0.02547	\$0.00	\$2,089.77	\$1,307.87	\$3,397.64
8/8/2011 (pre)	7,785	15,830	13,457	0.00	0.03460	0.02547	\$0.00	\$547.72	\$342.77	\$890.49
8/9/2011 (post)	24,522	49,861	42,387	0.00	0.03460	0.02547	\$0.00	\$1,725.19	\$1,079.67	\$2,804.86
Sep-11	35,426	72,032	61,236	0.00	0.03460	0.02547	\$0.00	\$2,492.31	\$1,559.78	\$4,052.09

\$0.00    \$15,875.57    \$9,935.50    \$25,811.07

Total Eligible Recovery Amount (Intrastate Terminating)    **\$15,875.57**

SkyLine TMC

FY 2011 Month	MOUs			Composite Rates			Revenues			
	Local	Intrastate	Interstate	Local	Intrastate	Interstate	Local	Intrastate	Interstate	Total
Oct-10	0	0	0	0.00	0.06953	0.01588	\$0.00	\$0.00	\$0.00	\$0.00
Nov-10	7,819	15,894	13,511	0.00	0.06953	0.01588	\$0.00	\$1,105.11	\$214.55	\$1,319.66
Dec-10	46,437	94,423	80,270	0.00	0.06953	0.01588	\$0.00	\$6,565.23	\$1,274.69	\$7,839.92
Jan-11	104,205	211,884	180,126	0.00	0.06953	0.01588	\$0.00	\$14,732.29	\$2,860.40	\$17,592.69
Feb-11	128,234	260,743	221,662	0.00	0.06953	0.01588	\$0.00	\$18,129.46	\$3,519.99	\$21,649.45
Mar-11	157,668	320,592	272,541	0.00	0.06953	0.01588	\$0.00	\$22,290.76	\$4,327.95	\$26,618.71
Apr-11	152,632	310,352	263,836	0.00	0.06953	0.01588	\$0.00	\$21,578.77	\$4,189.72	\$25,768.49
May-11	158,777	322,847	274,458	0.00	0.06953	0.01588	\$0.00	\$22,447.55	\$4,358.39	\$26,805.94
Jun-11	162,273	329,954	280,500	0.00	0.06953	0.01588	\$0.00	\$22,941.70	\$4,454.34	\$27,396.04
Jul-11	155,008	315,183	267,942	0.00	0.06953	0.01588	\$0.00	\$21,914.67	\$4,254.92	\$26,169.59
8/8/2011 (pre)	38,249	77,772	66,116	0.00	0.06953	0.01588	\$0.00	\$5,407.49	\$1,049.92	\$6,457.41
8/9/2011 (post)	100,258	203,859	173,304	0.00	0.06953	0.01588	\$0.00	\$14,174.32	\$2,752.07	\$16,926.39
Sep-11	115,684	235,224	199,968	0.00	0.06953	0.01588	\$0.00	\$16,355.12	\$3,175.49	\$19,530.61

\$0.00 \$187,642.47 \$36,432.43 \$224,074.90

Total Eligible Recovery Amount (Intrastate Terminating) **\$187,642.47**