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April 28, 2015

Accepted / Filed

APR 28 2015

Federal Communications Commission
Office of the Secretary

VIA HAND DELIVERY

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

DOCKET FILE COPY ORIGINAL

Attention: Wireline Competition Bureau

**Re: Petition for Limited Waiver of § 51.917(b)(7)(ii)
AL ILEC Petitioners
Connect America Fund, WC Docket Nos. 10-90 et al.**

Dear Ms. Dortch:

On behalf of Blountsville Telephone LLC, Brindlee Mountain Telephone LLC, Hopper Telecommunications LLC, Otelco Telephone LLC and Pine Belt Telephone Company, Inc. (collectively, "AL ILEC Petitioners"), JSI respectfully submits the above-referenced Petition for Limited Waiver. AL ILEC Petitioners seek a limited waiver of Federal Communications Commission rules Section 51.917(b)(7)(ii), 2011 Rate-of-Return Carrier Base Period Revenue.

AL ILEC Petitioners seek confidential treatment under the Third Protective Order in this proceeding.¹ Pursuant to the Order, one copy of the confidential document and two copies of the redacted version are provided. The redacted version is also being filed on the Electronic Comment Filing System.

Please direct inquiries regarding this Petition for Limited Waiver to the undersigned consultant for the AL ILEC Petitioners.

Sincerely,

John Kuykendall
Vice President

No. of Copies rec'd 0+1
List ABCDE

Enclosures

¹ See Third Protective Order, WC Docket Nos. 10-90 et al., DA 12-1418 rel. Aug. 30, 2012 ("Order").

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Accepted / Filed

APR 28 2015

Federal Communications Commission
Office of the Secretary

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 BLOUNTSVILLE TELEPHONE LLC, BRINDLEE MOUNTAIN
TELEPHONE LLC, HOPPER TELECOMMUNICATIONS LLC, OTELCO
TELEPHONE LLC AND PINE BELT TELEPHONE COMPANY, INC.
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”),¹ the Otelco Inc. companies of Blountsville Telephone LLC, Brindlee Mountain Telephone LLC, Hopper Telecommunications LLC and Otelco Telephone LLC (collectively referred to as “Otelco Companies”) and Pine Belt Telephone Company, Inc. (jointly referred to

¹ 47 C.F.R. § 1.3.

herein as “AL ILEC Petitioners”) hereby request a limited waiver of 47 C.F.R. Section 51.917(b)(7)(ii).² As explained herein, AL ILEC Petitioners seek to include amounts owed by Halo Wireless, Inc. (“Halo”) in Fiscal Year 2011 (“FY 2011”)³ in the AL ILEC Petitioners’ Carrier Base Period Revenues (“BPR”). Exclusion of the amounts owed to AL ILEC Petitioners in the BPR has a significant adverse impact on the AL ILEC Petitioners’ recovery mechanism funding, which in turn has challenged AL ILEC Petitioners by limiting their ability to invest in, and improve, their networks. AL ILEC Petitioners seek to include these amounts, which were billed to Halo but not collected by March 31, 2012, in the BPR effective July 1, 2012. The Commission has good cause to grant the AL 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*.⁴ Likewise, the AL ILEC Petitioners’ requested relief herein is similar to the relief that the FCC recently granted, with conditions, for another similarly situated group of providers.⁵ The AL ILEC Petitioners respectfully request emergency expedited attention to this matter.

I. BACKGROUND

AL ILEC Petitioners are rural incumbent local exchange carriers (“RLECs”) operating within rural areas of Alabama. While the AL 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 Alabama. Collectively, the AL

² *Id.* at 51.917(b)(7)(ii).

³ Defined as October 1, 2010 to September 30, 2011.

⁴ 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 Comm. Cedar Valley, et al v. FCC 11-161*, No. 11-9900 www.ca10.uscourts.gov/opinions/11/11-9900.pdf (10th Cir. filed May 23, 2014).

⁵ See *Connect America Fund et al.*, WC Docket No. 10-90 *et al.*, Order, FCC 14-121 (rel. Aug. 7, 2014) (“*TDS Waiver Order*”).

ILEC Petitioners have been deprived of nearly \$72,437.86 that would have been included in their annual BPR but for Halo's access avoidance efforts and subsequent bankruptcy.

The Otelco Companies, consisting of Blountsville Telephone LLC, Brindlee Mountain Telephone LLC, Hopper Telecommunications LCC, and Otelco Telephone LLC, have been serving rural communities in Alabama with high-quality voice and broadband services since the early 1900s. The terrain served consists of foothills of the Appalachian mountain range, covered in hardwood and pine forests. This geography, along with the low density, leads to a higher cost to both deploy and maintain services.

The Otelco Companies request a total BPR adjustment of \$55,903.45 associated with billed, but not collected, terminating intrastate access revenues for services provided to Halo Wireless during FY 2011.

Pine Belt Telephone Company is headquartered in Arlington, Alabama and has been providing local exchange services since 1958. Pine Belt's service area includes approximately 800 square miles located in the western part of Wilcox County with miles of rolling hills, abundant forests and fertile farm land. The area is bounded by the Alabama River in the east and the Tombigbee River in the west.

Pine Belt requests a BPR adjustment of \$16,534.41 associated with billed, but not collected, terminating intrastate access revenues for services provided to Halo Wireless during FY 2011.

AL ILEC Petitioners all serve high-cost, rural, remote, and challenging areas of Alabama consisting of low-income areas and very low density of access lines per square mile. The AL ILEC Petitioners strive to deliver modern and reliable communications services to customers that would likely have no (or very few) alternative providers. The AL ILEC Petitioners 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 AL 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 undermine and frustrate their mission.

The events described below have produced a recurring penalty for the AL ILEC Petitioners, as they will never receive the amounts owed by Halo, *and* the negative annual impact on the AL ILEC Petitioners’ recovery mechanism funding puts them in a position where seeking relief from the Commission is the only viable option left at this point. AL ILEC 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 terminating intrastate revenue that they should have collected from Halo as well as fairly assessed recovery mechanism funding going forward. AL 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 terminating intrastate intercarrier compensation charges does not reoccur every year, consistent with a recent decision by the Commission related to similarly situated providers.⁶

The AL 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.⁷ Halo subsequently refused to pay all such terminating intrastate access charges to each of the AL ILEC Petitioners. Halo erroneously argued that because it was a CMRS provider, all of its traffic delivered to the AL

⁶ See *TDS Waiver Order*.

⁷ As further addressed below, Petitioners requested BPR adjustments are limited to billed, but not collected, revenues for FY 2011.

ILEC Petitioners was intraMTA CMRS and that no compensation was due for transport and termination. The numerous resulting disputes with ILECs 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."⁸

To further aggravate the difficulties in collecting billed intercarrier compensation fees from Halo, it appears that Halo's estate lacks sufficient assets to pay the amounts owed to the AL ILEC Petitioners that were harmed. While the AL ILEC Petitioners have filed both pre-petition and post-petition administrative claims in bankruptcy court,⁹ they cannot simply get in line and wait for a reasonable settlement because the Commission required that all revenues included in calculating BPR 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 AL ILEC Petitioners. The AL ILEC 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 AL ILEC Petitioners meet the requisite conditions in order to make the necessary BRP adjustments, as further outlined below.

⁸ See *USF/ICC Transformation Order*, Par. 1006.

⁹ See generally Claims Register, *In re: Halo Wireless, Inc.*, Case No. 11-42464, Bkrcty. E.D. Tex. (converted July 19, 2012) (including pre-petition claims and administrative expense (post-petition) claims filed by Petitioners).

II. GOOD CAUSE EXISTS TO GRANT AL ILEC PETITIONERS' REQUESTED WAIVER

In general, the FCC's rules may be waived for good cause shown.¹⁰ Waiver is appropriate where the "particular facts would make strict compliance inconsistent with the public interest."¹¹ The FCC may grant a waiver of its rules where the requested relief would not undermine the policy objective of the rule in question, special circumstances warrant a deviation from the general rule, and such deviation will serve the public interest.¹²

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.¹³ 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.

¹⁰ 47 C.F.R. § 1.3.

¹¹ 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*").

¹² 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).

¹³ See *USF/ICC Transformation Order* at footnote 1745.

The overall purpose of this waiver petition is consistent with the FCC's statement above as it would allow the AL 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 AL ILEC Petitioners' control, as outlined above.

AL ILEC Petitioners' argument for good cause is further supported by similar 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, including the Commission's recent decision in the *TDS Waiver 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."¹⁴ Like each of the AL 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."¹⁵ The AL ILEC Petitioners echo these statements and emphasize that the loss created by Halo's refusal to pay applicable intercarrier compensation charges 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 AL ILEC Petitioners' requested relief.

¹⁴ 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.

¹⁵ *Id.* at pg. 3-4 and 12.

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 Petitioners' ICC recovery mechanism revenues."¹⁶ Further, as described below, this impact on recovery amounts would continue far into the future, such that AL ILEC Petitioners would suffer ongoing harm because of Halo's behavior, without some form of Commission action.

The loss imposed on AL ILEC Petitioners by the combined effects of Halo's unpaid terminating 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 BPR 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 the *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 AL ILEC Petitioners' FY 2011 BPR. Further, grant of the limited waiver would serve the public interest in that the AL 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

¹⁶ See *TDS Waiver Order* at 4.

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 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.¹⁷

As detailed below, AL ILEC Petitioners hereby certify that they meet each of the above five conditions. AL ILEC Petitioners terminated all intrastate access traffic sent to it by Halo during FY 2011 that they seek to add to their BPR calculations and AL ILEC Petitioners 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. On August 29, 2013, the Alabama Public Service Commission ("APSC") issued an order, see Attachment 1, that found that Halo is liable for access charges on non-local intrastate landline traffic that Halo has sent for termination.¹⁸

Additionally, AL ILEC Petitioners filed a timely claim in the Halo bankruptcy case requesting compensation for such traffic. The terminating intrastate amounts that Halo owes for

¹⁷ *Id.* at 5.

¹⁸ See APSC Order, Docket 31682, issued August 29, 2013. Attachment 1.

FY 2011 and the BPR adjustment for each of the AL ILEC Petitioners' study areas does not exceed the intrastate access portion of the bankruptcy claim for that study area.

Finally, the AL 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 AL ILEC Petitioners hereby respectfully request that the Commission include the following amounts in their BPR.

<u>AL ILEC Petitioner:</u>	<u>BPR Adjustment:</u>
Blountsville Telephone LLC	\$ 8,135.07
Brindlee Mountain Telephone LLC	\$22,789.94
Hopper Telecommunications LLC	\$ 8,430.62
Otelco Telephone LLC	\$16,547.82
Pine Belt Telephone Company, Inc.	\$16,534.41

AL ILEC Petitioners request that these amounts be included retroactively in the BPR effective as of July 1, 2012. The AL 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,

/s/ Dennis Andrews
Senior Vice President
Otelco Companies
505 3rd Ave East
Oneonta, AL 35121

REDACTED FOR PUBLIC INSPECTION

/s/ John Nettles
President
Pine Belt Telephone Company
3984 County Road 32
Arlington, Alabama 36722

Filed April 28, 2015

Attachments

Attachment 1

Alabama Public Service
Commission Order

IN THE MATTER OF :)	
)	
BELLSOUTH TELECOMMUNICATIONS, LLC,)	
d/b/a AT&T ALABAMA)	
Complainant)	
)	DOCKET 31682
v.)	
)	
HALO WIRELESS, INC.,)	
d/b/a FREEDOM COMMUNICATIONS USA, LLC)	
Defendant.)	

ORDER ON UNOPPOSED MOTION TO ENTER CONSENT JUDGMENT

BY THE COMMISSION:

On or about December 11, 2012, BellSouth Telecommunications, LLC, d/b/a AT&T Alabama (AT&T” or “AT&T Alabama”) filed with the Commission its Unopposed Motion to Enter Consent Judgment (“Unopposed Motion”) in the above-captioned matter. AT&T requests that the Commission resolve this complaint case by adopting the consent judgment in light of the facts set forth in the Unopposed Motion to Enter Consent Judgment. The Commission finds that the request is well-taken and should be granted.

The Commission hereby enters the following findings of fact and conclusions of law:

- (a) Halo has materially breached the ICA by: (1) sending landline-originated traffic to AT&T Alabama, (2) inserting incorrect charge number (“CN”) information on calls; and (3) failing to pay for facilities it has ordered pursuant to the ICA;
- (b) As a result of these breaches, AT&T Alabama is excused from further performance under the ICA;
- (c) Without this Commission quantifying any specific amount due, we hereby find that Halo is liable to AT&T Alabama for access charges on the non-local landline-originated traffic Halo has sent to AT&T Alabama for termination to AT&T Alabama’s end user customers; ^[1] and
- (d) Without this Commission quantifying any specific amount due, we hereby find that Halo is liable to AT&T Alabama for interconnection facilities charges that it has refused to pay AT&T Alabama.

IT IS, THEREFORE, ORDERED BY THE COMMISSION, That for good cause shown, the Unopposed Motion to Enter Consent Judgment is granted.

IT IS FURTHER ORDERED BY THE COMMISSION, That jurisdiction in this cause is hereby retained for the issuance of any further order or orders as may appear just and reasonable in the premises.

IT IS FURTHER ORDERED, That this Order shall be effective as of the date hereof.

DONE at Montgomery, Alabama, this 29th day of August, 2013. REDACTED FOR PUBLIC INSPECTION

ALABAMA PUBLIC SERVICE COMMISSION

Twinkle Andress Cavanaugh, President

Jeremy H. Oden, Commissioner

Terry L. Dunn, Commissioner

ATTEST: A True Copy

Walter L. Thomas, Jr., Secretary

[1] For the avoidance of doubt, we note that Halo's liability for access charges of non-local traffic that Halo sent to AT&T Alabama for delivery to third party carriers for termination to their end user customers runs to those third party carriers, rather than to AT&T Alabama.

Attachment 2

FY2011 Eligible Recovery Schedules

Brindlee Mountain Telephone Company

FY 2011 Month	MOUs			Composite Rates			Revenues			
	Local	Intrastate	Interstate	Local	Intrastate	Interstate	Local	Intrastate	Interstate	Total
Oct-10				0.00	0.03177	0.01983				
Nov-10				0.00	0.03177	0.01983				
Dec-10				0.00	0.03177	0.01983				
Jan-11				0.00	0.03177	0.01983				
Feb-11				0.00	0.03177	0.01983				
Mar-11				0.00	0.03177	0.01983				
Apr-11				0.00	0.03177	0.01983				
May-11				0.00	0.03177	0.01983				
Jun-11				0.00	0.03177	0.01983				
Jul-11				0.00	0.03177	0.02191				
8/8/2011 (pre)				0.00	0.03177	0.02191				
8/9/2011 (post)				0.00	0.03177	0.02191				
Sep-11				0.00	0.03177	0.02191				

Total Eligible Recovery Amount (Intrastate Terminating)

\$22,789.94

Blountsville Telephone Company

FY 2011 Month	MOUs			Composite Rates			Revenues			
	Local	Intrastate	Interstate	Local	Intrastate	Interstate	Local	Intrastate	Interstate	Total
Oct-10				0.00	0.03169	0.02119				
Nov-10				0.00	0.03169	0.02119				
Dec-10				0.00	0.03169	0.02119				
Jan-11				0.00	0.03169	0.02119				
Feb-11				0.00	0.03169	0.02119				
Mar-11				0.00	0.03169	0.02119				
Apr-11				0.00	0.03169	0.02119				
May-11				0.00	0.03169	0.02119				
Jun-11				0.00	0.03169	0.02119				
Jul-11				0.00	0.03169	0.03417				
8/8/2011 (pre)				0.00	0.03169	0.03417				
8/9/2011 (post)				0.00	0.03169	0.03417				
Sep-11				0.00	0.03169	0.03417				

Total Eligible Recovery Amount (Intrastate Terminating)

\$8,135.07

Hopper Telephone Company

FY 2011 Month	MOUs			Composite Rates			Revenues			
	Local	Intrastate	Interstate	Local	Intrastate	Interstate	Local	Intrastate	Interstate	Total
Oct-10				0.00	0.03462	0.04088				
Nov-10				0.00	0.03462	0.04088				
Dec-10				0.00	0.03462	0.04088				
Jan-11				0.00	0.03462	0.04088				
Feb-11				0.00	0.03462	0.04088				
Mar-11				0.00	0.03462	0.04088				
Apr-11				0.00	0.03462	0.04088				
May-11				0.00	0.03462	0.04088				
Jun-11				0.00	0.03462	0.04088				
Jul-11				0.00	0.03462	0.04433				
8/8/2011 (pre)				0.00	0.03462	0.04433				
8/9/2011 (post)				0.00	0.03462	0.04433				
Sep-11				0.00	0.03462	0.04433				

Total Eligible Recovery Amount (Intrastate Terminating)

\$8,430.62

Otelco Telephone Company

FY 2011 Month	MOUs			Composite Rates			Revenues			
	Local	Intrastate	Interstate	Local	Intrastate	Interstate	Local	Intrastate	Interstate	Total
Oct-10				0.00	0.03266	0.02025				
Nov-10				0.00	0.03266	0.02025				
Dec-10				0.00	0.03266	0.02025				
Jan-11				0.00	0.03266	0.02025				
Feb-11				0.00	0.03266	0.02025				
Mar-11				0.00	0.03266	0.02025				
Apr-11				0.00	0.03266	0.02025				
May-11				0.00	0.03266	0.02025				
Jun-11				0.00	0.03266	0.02025				
Jul-11				0.00	0.03266	0.02264				
8/8/2011 (pre)				0.00	0.03266	0.02264				
8/9/2011 (post)				0.00	0.03266	0.02264				
Sep-11				0.00	0.03266	0.02264				

Total Eligible Recovery Amount (Intrastate Terminating)

\$16,547.82

Pine Belt Telephone Company

FY 2011 Month	MOUs			Composite Rates			Revenues			
	Local	Intrastate	Interstate	Local	Intrastate	Interstate	Local	Intrastate	Interstate	Total
Oct-10				0.00	0.00000	0.00000				
Nov-10				0.00	0.03883	0.03150				
Dec-10				0.00	0.03883	0.03150				
Jan-11				0.00	0.03883	0.03150				
Feb-11				0.00	0.03883	0.03150				
Mar-11				0.00	0.03883	0.03150				
Apr-11				0.00	0.03883	0.03150				
May-11				0.00	0.03883	0.03150				
Jun-11				0.00	0.03883	0.03150				
Jul-11				0.00	0.03883	0.05110				
8/8/2011 (pre)				0.00	0.03883	0.05110				
8/9/2011 (post)				0.00	0.03883	0.05110				
Sep-11				0.00	0.03883	0.05110				

Total Eligible Recovery Amount (Intrastate Terminatin **\$16,534.41**