

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 HORRY TELEPHONE COOPERATIVE, INC., PBT TELECOM, INC.,  
PALMETTO RURAL TELEPHONE COOPERATIVE, INC., AND PIEDMONT RURAL  
TELEPHONE COOPERATIVE, 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”),<sup>1</sup> Horry Telephone Cooperative, Inc., PBT Telecom, Inc., Palmetto Rural Telephone Cooperative, Inc., and Piedmont Rural Telephone Cooperative, Inc. (jointly referred to herein as “SC ILEC Petitioners”) hereby request a limited waiver of 47 C.F.R. Section

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<sup>1</sup> 47 C.F.R. § 1.3.

51.917(b)(7)(ii).<sup>2</sup> As explained herein, SC ILEC Petitioners seek to include amounts owed by Halo Wireless, Inc. (“Halo”) in Fiscal Year 2011 (“FY 2011”)<sup>3</sup> in the SC ILEC Petitioners’ Carrier Base Period Revenues (“BPR”). SC 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 SC 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*.<sup>4</sup> Likewise, the SC ILEC Petitioners’ requested relief herein is similar to the relief that the FCC recently granted, with conditions, for other similarly situated providers.<sup>5</sup> Given that the FCC has acted favorably on waiver petitions filed by these carriers, the SC ILEC Petitioners believe there should be no reason to delay action on this petition and respectfully request expedited treatment.

## I. BACKGROUND

SC ILEC Petitioners are rural incumbent local exchange carriers (“RLECs”) operating within rural areas of South Carolina. While the SC 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 South Carolina. Collectively, the SC ILEC Petitioners have been deprived of nearly \$128,826.63 that would have been included in their annual BPR but for Halo’s access avoidance efforts and subsequent bankruptcy.

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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.*, 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](http://www.ca10.uscourts.gov/opinions/11/11-9900.pdf) (10th Cir. filed May 23, 2014).

<sup>5</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*”) and WC Docket No. 10-90 *et al.*, Order, DA 15-739 (rel. June 24, 2015) (“*June 2015 Halo Waiver Order*”).

**Horry Telephone Cooperative, Inc. (“Horry”)**, founded in 1952, is member-owned cooperative incumbent local exchange carrier serving customers throughout Horry and Georgetown Counties in South Carolina. Horry requests a total BPR adjustment of \$88,677.97 associated with billed, but not collected, terminating intrastate access and reciprocal compensation revenues for services provided to Halo Wireless during FY 2011.

**PBT Telecom, Inc. (“PBT”)**, founded in 1903, is an incumbent local exchange carrier that serves portions of Aiken, Calhoun, Edgefield, Lexington, Orangeburg, and Saluda Counties in rural South Carolina. PBT requests a BPR adjustment of \$21,544.13 associated with billed, but not collected, terminating intrastate access and reciprocal compensation revenues for services provided to Halo Wireless during FY 2011.

**Palmetto Rural Telephone Cooperative, Inc. (“Palmetto”)**, founded in 1955, is a member-owned cooperative incumbent local exchange carrier serving 1,054 square miles of Colleton County and two small areas of Bamberg County. Palmetto requests a BPR adjustment of \$14,993.95 associated with billed, but not collected, terminating intrastate access and reciprocal compensation revenues for services provided to Halo Wireless during FY 2011.

**Piedmont Rural Telephone Cooperative, Inc. (“Piedmont”)**, founded in 1950, is a member-owned cooperative incumbent local exchange carrier serving the local communities of Laurens, Gray Court, Hickory Tavern, Enoree, Waterloo, and West End all located in the county of Laurens, South Carolina. Piedmont requests a BPR adjustment of \$3,610.58 associated with billed, but not collected, terminating intrastate access and reciprocal compensation revenues for services provided to Halo Wireless during FY 2011.

The SC ILEC Petitioners strive to deliver modern and reliable communications services to customers that would likely have no (or very few) alternative providers. The SC 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.

The events described below have produced a recurring penalty for the SC ILEC Petitioners, as they will never receive the amounts owed by Halo, *and* the negative annual impact on the SC 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. SC 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. SC 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 recent decisions by the Commission related to similarly situated providers.<sup>6</sup>

The SC ILEC Petitioners initially began terminating Halo’s traffic in late 2010 or in early 2011, and then began billing Halo for such traffic in FY 2011. Halo subsequently refused to pay all such access charges to each of the SC ILEC Petitioners. Halo erroneously argued that because it was a CMRS provider, all of its traffic delivered to the SC 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

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<sup>6</sup> See *TDS Waiver Order and June 2015 Halo Waiver Order*.

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>

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 SC ILEC Petitioners that were harmed. While the SC ILEC Petitioners have filed administrative claims in bankruptcy court for pre-petition debt, post-petition debt or both,<sup>8</sup> they could not 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 SC ILEC Petitioners. The SC 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 decisions in both the *TDS Waiver Order* and the *June 2015 Halo Waiver Order*, the SC ILEC Petitioners meet the requisite conditions in order to make the necessary BRP adjustments, as further outlined below.

## **II. GOOD CAUSE EXISTS TO GRANT SC ILEC PETITIONERS’ REQUESTED WAIVER**

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<sup>7</sup> See *USF/ICC Transformation Order*, Par. 1006.

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

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 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 with the FCC's statement above as it would allow the SC ILEC Petitioners to include revenues associated with FY 2011 that were

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<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*").

<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.

billed but not collected due to Halo's deliberate access avoidance scheme (including Halo's bankruptcy) which were beyond the SC ILEC Petitioners' control, as outlined above.

SC ILEC Petitioners' argument for good cause is further supported by similar waiver petitions by other ILECs where the Commission has granted such petitions, subject to conditions, in its *TDS Waiver Order* and *June 2015 Halo Waiver Order*.<sup>13</sup> Like each of the SC ILEC Petitioners, the petitioners associated with these decisions did not expect to collect the amounts they billed to Halo as a result of Halo's bankruptcy and subsequent liquidation of assets. The SC ILEC Petitioners 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 SC ILEC Petitioners' requested relief.

In conditionally granting the TDS 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.”<sup>14</sup> In conditionally granting other similar Halo waiver petitions in its *June 24, 2015 Halo Waiver Order*, the Commission found that:

Petitioners have demonstrated good cause for waiver to allow them to add to their respective BPR calculations amounts reflecting intrastate access services and, in some cases, net reciprocal compensation for such traffic routed from Halo and terminated by Petitioners during FY 2011, and billed to, but not collected from, Halo. As the Commission found in the [*TDS*] *Halo Order*, absent such waivers, the unique combination of these circumstances would result in significant reductions to Petitioners' ICC recovery mechanism revenues. Further, without

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<sup>13</sup> See *TDS Waiver Order* at para. 2 and *June 2015 Halo Waiver Order* at para. 1.

<sup>14</sup> See *TDS Waiver Order* at 4.

some form of Commission action, such impact on recovery amounts would continue far into the future.<sup>15</sup>

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

Grant of this waiver clearly 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 SC ILEC Petitioners' FY 2011 BPR. Further, grant of the limited waiver would serve the public interest in that the SC ILEC Petitioners would be able to receive the benefit of the transitional recovery mechanism to the full extent intended by the Commission and continue to provide high quality telecommunications services to their customers consistent with the FCC's National Broadband Plan, USF Reform, and IP Transition goals.

### **III. WAIVER CONDITIONS**

In granting previous 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, in the most recent Halo decision, the Commission found that:

Prior to the implementation of the relief granted in this Order, each Petitioner must, in order to receive such relief, certify under penalty of perjury the following:

- First, that it terminated all of the intrastate access and if applicable, reciprocal compensation traffic (compensable traffic), sent to it by Halo for termination during FY 2011 that it seeks to add to its BPR calculations. This condition will limit BPR

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<sup>15</sup> See *June 2015 Halo Waiver Order* at 6.

adjustments to reflect traffic for which compensable services that were actually provided.

- Second, that it billed Halo for such compensable traffic during FY 2011 or before the close of the next regular billing cycle in Fiscal Year 2012 for the amounts to be added to BPR calculations. This condition is designed to limit BPR adjustments to those relating to revenue that Petitioners attempted to collect from Halo for the provision of compensable traffic during FY 2011.
- Third, that a court or state regulatory agency of competent jurisdiction (e.g., a state commission) has made a finding of liability against Halo regarding each category of the requested compensation for such traffic.
- Fourth, that it filed a timely claim in the Halo bankruptcy case that requests compensation for such traffic, and any BPR adjustment for a study area resulting from this Order does not exceed the terminating portion of such petitioner's bankruptcy claim for that study area. These requirements are intended to prevent Petitioners from taking actions now to increase their BPR adjustments beyond the amounts of their claims in the Halo bankruptcy case.
- Fifth, that its BPR adjustment amounts do not include any interest, late payment fees, collection fees, or attorney fees, in order to ensure that BPR adjustments are limited to revenue associated with compensable traffic, and do not include other types of revenue. In addition, such certification must confirm that the revenues supporting the requested BPR adjustments are not already included in the BPR calculations.<sup>16</sup>

As detailed below, each SC ILEC Petitioner hereby certifies that each one meets each of the above five conditions. All SC ILEC Petitioners terminated all compensable traffic sent to it by Halo during FY 2011 that they seek to add to their BPR calculations and all SC ILEC Petitioners billed Halo for such compensable 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 July 17, 2012, the South Carolina Public Service Commission ("SCPSC") issued an order that found Halo was delivering landline-originated traffic to the carriers and is liable for the appropriate charges.<sup>17</sup>

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<sup>16</sup> *June 2015 Halo Waiver Order* at 20.

<sup>17</sup> See *SCPSC Order Granting Relief Against Halo Wireless*, Docket 2011-304-C, Order No. 2012-516, issued July 17, 2012.

Additionally, each SC ILEC Petitioner filed a timely claim in the Halo bankruptcy case requesting compensation for such compensable traffic and the BPR adjustment for each petitioner's study area does not exceed the terminating portion of the petitioner's bankruptcy claim for that study area.

Finally, each SC ILEC Petitioner hereby certifies that the BPR adjustments outlined below do not include revenues that are already included in their relevant baselines, 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 SC ILEC Petitioners hereby respectfully request that the Commission include the following amounts in their BPR.

<u>SC ILEC Petitioner:</u>	<u>BPR Adjustment:</u>
Horry Telephone Cooperative, Inc.	\$88,677.97
PBT Telecom, Inc.	\$21,544.13
Palmetto Rural Telephone Cooperative, Inc.	\$14,993.95
Piedmont Rural Telephone Cooperative, Inc.	\$ 3,610.58

SC ILEC Petitioners request that these amounts be included retroactively in the BPR effective as of July 1, 2012. The SC 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 February 1, 2016

Attachments

**Horry Telephone Cooperative**

SAC - 240528

FY 2011 Month	MOUs			Composite Rates			Revenues			
	Local	Intrastate	Interstate	Local	Intrastate	Interstate	Local	Intrastate	Interstate	Total
Oct-10	0	0	0	0.0000000	0.0000000	0.0000000	\$0.00	\$0.00	\$0.00	\$0.00
Nov-10	0	0	0	0.0000000	0.0000000	0.0000000	\$0.00	\$0.00	\$0.00	\$0.00
Dec-10	0	0	0	0.0000000	0.0000000	0.0000000	\$0.00	\$0.00	\$0.00	\$0.00
Jan-11	387,435	262,089	489,992	0.0095498	0.0095498	0.0117727	\$3,699.93	\$2,502.89	\$5,768.52	\$11,971.34
Feb-11	437,881	296,213	553,790	0.0095498	0.0095498	0.0117727	\$4,181.67	\$2,828.78	\$6,519.60	\$13,530.05
Mar-11	496,167	335,643	627,506	0.0095498	0.0095498	0.0117727	\$4,738.30	\$3,205.32	\$7,387.43	\$15,331.05
Apr-11	644,780	436,175	815,458	0.0095498	0.0095498	0.0117727	\$6,157.52	\$4,165.38	\$9,600.12	\$19,923.02
May-11	761,386	515,055	962,930	0.0095498	0.0095498	0.0117727	\$7,271.09	\$4,918.68	\$11,336.26	\$23,526.03
Jun-11	803,005	543,209	1,015,565	0.0095498	0.0095498	0.0117727	\$7,668.54	\$5,187.54	\$11,955.93	\$24,812.01
Jul-11	721,563	488,116	912,564	0.0095498	0.0095498	0.0117727	\$6,890.78	\$4,661.41	\$10,743.33	\$22,295.52
8/8/2011 (pre)	180,673	122,220	228,498	0.0095498	0.0095498	0.0117727	\$1,725.39	\$1,167.18	\$2,690.04	\$5,582.61
8/9/2011 (post)	496,851	336,105	628,370	0.0095498	0.0095498	0.0117727	\$4,744.83	\$3,209.74	\$7,397.61	\$15,352.18
Sep-11	609,183	412,094	770,437	0.0095498	0.0095498	0.0117727	\$5,817.58	\$3,935.42	\$9,070.12	\$18,823.12

\$52,895.63    \$35,782.34    \$82,468.96    \$171,146.93

**Total Eligible Recovery Amount (Intrastate & Reciprocal Compensation Terminating)    \$88,677.97**

PBT Telecom

SAC - 240539

FY 2011 Month	MOUs			Composite Rates			Revenues			
	Local	Intrastate	Interstate	Local	Intrastate	Interstate	Local	Intrastate	Interstate	Total
Oct-10	0	0	0	0.000000	0.000000	0.000000	\$0.00	\$0.00	\$0.00	\$0.00
Nov-10	0	0	0	0.000000	0.000000	0.000000	\$0.00	\$0.00	\$0.00	\$0.00
Dec-10	0	0	0	0.000000	0.000000	0.000000	\$0.00	\$0.00	\$0.00	\$0.00
Jan-11	0	0	0	0.000000	0.000000	0.000000	\$0.00	\$0.00	\$0.00	\$0.00
Feb-11	126,726	85,726	160,271	0.009502	0.009502	0.037693	\$1,204.15	\$814.57	\$6,041.09	\$8,059.81
Mar-11	225,882	152,803	285,675	0.009502	0.009502	0.037693	\$2,146.34	\$1,451.93	\$10,767.94	\$14,366.21
Apr-11	170,245	115,166	215,310	0.009502	0.009502	0.037693	\$1,617.67	\$1,094.30	\$8,115.67	\$10,827.64
May-11	208,128	140,793	263,221	0.009502	0.009502	0.037693	\$1,977.63	\$1,337.81	\$9,921.58	\$13,237.02
Jun-11	284,408	192,394	359,693	0.009502	0.009502	0.037693	\$2,702.45	\$1,828.13	\$13,557.90	\$18,088.48
Jul-11	260,516	176,231	329,476	0.009502	0.009502	0.037693	\$2,475.42	\$1,674.55	\$12,418.94	\$16,568.91
8/8/2011 (pre)	40,819	27,613	51,624	0.009502	0.009502	0.037693	\$387.86	\$262.37	\$1,945.85	\$2,596.08
8/9/2011 (post)	35,716	24,161	45,171	0.009502	0.009502	0.037693	\$339.38	\$229.58	\$1,702.61	\$2,271.57
Sep-11	0	0	0	0.000000	0.000000	0.000000	\$0.00	\$0.00	\$0.00	\$0.00

\$12,850.89      \$8,693.24      \$64,471.58      \$86,015.71

Total Eligible Recovery Amount (Intrastate & Reciprocal Compensation Terminating) **\$21,544.13**

Palmetto Rural Telephone Cooperative  
 SAC - 240536

FY 2011 Month	MOUs			Composite Rates			Revenues			
	Local	Intrastate	Interstate	Local	Intrastate	Interstate	Local	Intrastate	Interstate	Total
Oct-10	0	0	0	0.000000	0.000000	0.000000	\$0.00	\$0.00	\$0.00	\$0.00
Nov-10	19,359	13,096	24,484	0.009146	0.009146	0.030170	\$177.07	\$119.78	\$738.68	\$1,035.53
Dec-10	81,341	55,025	102,872	0.009099	0.009099	0.030170	\$740.15	\$500.69	\$3,103.65	\$4,344.49
Jan-11	118,612	80,238	150,009	0.009125	0.009125	0.030170	\$1,082.39	\$732.21	\$4,525.79	\$6,340.39
Feb-11	107,601	72,789	136,083	0.009141	0.009141	0.030170	\$983.57	\$665.35	\$4,105.64	\$5,754.56
Mar-11	119,753	81,009	151,452	0.009153	0.009153	0.030170	\$1,096.08	\$741.47	\$4,569.30	\$6,406.85
Apr-11	106,256	71,879	134,383	0.009157	0.009157	0.030170	\$972.97	\$658.19	\$4,054.34	\$5,685.50
May-11	121,868	82,440	154,127	0.009162	0.009162	0.030170	\$1,116.50	\$755.28	\$4,650.02	\$6,521.80
Jun-11	139,454	94,337	176,369	0.009165	0.009165	0.030170	\$1,278.10	\$864.60	\$5,321.04	\$7,463.74
Jul-11	132,392	89,559	167,437	0.009183	0.009183	0.030170	\$1,215.79	\$822.44	\$5,051.57	\$7,089.80
8/8/2011 (pre)	30,614	20,710	38,718	0.009183	0.009183	0.030170	\$281.14	\$190.18	\$1,168.12	\$1,639.44
8/9/2011 (post)	0	0	0	0.000000	0.000000	0.000000	\$0.00	\$0.00	\$0.00	\$0.00
Sep-11	0	0	0	0.000000	0.000000	0.000000	\$0.00	\$0.00	\$0.00	\$0.00

\$8,943.76    \$6,050.19    \$37,288.15    \$52,282.10

Total Eligible Recovery Amount (Intrastate & Reciprocal Compensation Terminating) **\$14,993.95**

**Piedmont Rural Telephone Cooperative**

SAC - 240538

FY 2011 Month	MOUs			Composite Rates			Revenues			
	Local	Intrastate	Interstate	Local	Intrastate	Interstate	Local	Intrastate	Interstate	Total
Oct-10	0	0	0	\$0.000000	\$0.000000	\$0.000000	\$0.00	\$0.00	\$0.00	\$0.00
Nov-10	0	0	0	\$0.000000	\$0.000000	\$0.000000	\$0.00	\$0.00	\$0.00	\$0.00
Dec-10	0	0	0	\$0.000000	\$0.000000	\$0.000000	\$0.00	\$0.00	\$0.00	\$0.00
Jan-11	0	0	0	\$0.000000	\$0.000000	\$0.000000	\$0.00	\$0.00	\$0.00	\$0.00
Feb-11	0	0	0	\$0.000000	\$0.000000	\$0.000000	\$0.00	\$0.00	\$0.00	\$0.00
Mar-11	0	0	0	\$0.000000	\$0.000000	\$0.000000	\$0.00	\$0.00	\$0.00	\$0.00
Apr-11	0	0	0	\$0.000000	\$0.000000	\$0.000000	\$0.00	\$0.00	\$0.00	\$0.00
May-11	56,615	38,298	71,601	\$0.009252	\$0.009252	\$0.009252	\$523.80	\$354.34	\$662.46	\$1,540.60
Jun-11	45,278	30,630	57,264	\$0.009252	\$0.009252	\$0.009252	\$418.92	\$283.38	\$529.81	\$1,232.11
Jul-11	48,506	32,813	61,346	\$0.009252	\$0.009252	\$0.009252	\$448.78	\$303.59	\$567.58	\$1,319.95
8/8/2011 (pre)	9,889	6,689	12,506	\$0.009252	\$0.009252	\$0.009252	\$91.49	\$61.89	\$115.71	\$269.09
8/9/2011 (post)	28,430	19,232	35,956	\$0.009252	\$0.009252	\$0.009252	\$263.04	\$177.94	\$332.66	\$773.64
Sep-11	44,061	29,806	55,724	\$0.009252	\$0.009252	\$0.009252	\$407.65	\$275.76	\$515.56	\$1,198.97

\$2,153.68    \$1,456.90    \$2,723.78    \$6,334.36

Total Eligible Recovery Amount (Intrastate & Reciprocal Compensation Terminating) **\$3,610.58**