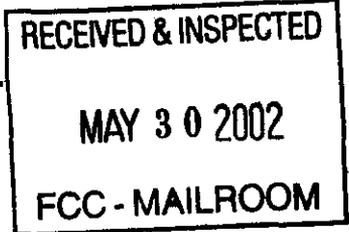


EX PARTE OR LATE FILED

STATE OF MARYLAND

ORIGINAL



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May 29, 2002

Ex Parte

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-A325
Washington, DC 20554

Re: CALLS Order Remand Proceeding
CC Docket Nos. 96-262, 94-1, 99-249 and 96-45

Dear Ms. Dortch:

The Maryland Office of People's Counsel (MOPC) and National Association of State Utility Consumer Advocates (NASUCA) respectfully submit these Ex Parte Comments concerning the annual \$650 million Interstate Access Support Mechanism under consideration in the CALLS Order Remand Proceeding.

Please note that along with the Ex Parte Comments, MOPC/NASUCA is filing associated Tables A through E. Tables A and B contain Confidential Line Count Information included pursuant to the Commission's Interim Protective Order, CC Docket No. 96-45 and its first and second orders modifying the Interim Protective Order. Tables A and B will be submitted under separate cover requesting confidential treatment.

Pursuant to FCC Rule 1.49(f), this Ex Parte filing is being filed electronically via the Electronic Comment Filing System for inclusion in the public record of the above-referenced proceedings pursuant to FCC Rule 1.1206(b)(2). Additionally, two copies are being submitted to your office for each of the above-referenced dockets.

Marlene H. Dortch, Secretary

Page 2

May 29, 2002

Thank you for your consideration of this matter. Should you have any questions concerning the issues presented in this filing, please do not hesitate to contact me at the above number or David Gabel on 617-243-0093.

Very truly yours,


Michael J. Travieso
People's Counsel

Attorney for National
Association of State Utility
Consumer Advocates
(NASUCA)

MJT/mcm

Enclosure

cc Ted Burmeister
Bill Scher

Ex Parte
CC Docket Nos. 96-262, 94-1, 99-249, 96-45
CALLS Order Remand Proceeding

Introduction

The Maryland Office of People's Counsel (MOPC) and National Association of State Utility Consumer Advocates (NASUCA) respectfully submit the attached tables which demonstrate that the FCC's use of an annual \$650 million interstate access support mechanism is more than sufficient under the current Subscriber Line Charge (SLC) cap of \$5.00. These tables illustrate the level of surplus support afforded carriers by the current \$650 million fund and demonstrate how this excess funding increases significantly if the FCC were to approve an increase to the SLC cap.

While we do not intend to repeat the arguments MOPC/NASUCA presented in its reply comments we would like to provide a brief summary of how MOPC/NASUCA determined that the amount of interstate access support should not exceed \$629 million if the FCC retains the current \$5.00 residential and single-line business cap, and that the amount of support should decrease to a maximum of \$336 million if the FCC allows the residential and single-line business SLC cap to increase to \$6.50. We believe that a deeper understanding of our how our calculations were executed will provide further insight into the problem at hand and reveal the superiority of our support estimates.

As noted above, it is necessary to first transform the FCC's Synthesis Model so that it estimates common line access costs. MOPC/NASUCA is the only party that correctly:

1. Calculated per line common costs;
2. Separated interstate costs from the total cost of service;
3. Removed redundant structure cost from the model outputs;
4. Removed traffic-sensitive loop costs from the total loop cost;
5. Developed the appropriate geographic area for determining loop costs.

Without making these adjustments the standard application of the Synthesis Model will overstate the cost of providing interstate access services and, therefore, exaggerate the amount of support required by the interstate access support mechanism.¹

¹ While the support estimates calculated by MOPC/NASUCA are the most accurate estimates on the record in this proceeding we believe that these estimates nevertheless overstate the size of the interstate access fund because they do not reflect the higher SLC revenue obtained from non-primary lines. MOPC/NASUCA strongly urges the FCC to include the higher revenue from non-primary SLCs in its determination of the required level of support.

Description of Net Contribution Tables²

The support amounts that appear in these tables were calculated with the help of data retrieved from USAC databases and the FCC's Synthesis model outputs. The relevant variables in the workpapers are:

- [Column D] "Total Lines" is the sum of residential and single line business lines;
- [Column E] "Zone Average Cost" is calculated on an monthly basis per observation using the aforementioned Synthesis Model transformation;³
- [Column F] "Economic Cost" is "Total Lines" multiplied by "Zone Average Cost" multiplied by 12 or $([D] * [E] * 12)$;
- [Column G] "Effective SLC" is the lesser of the \$5.00 SLC cap or the maximum allowed CMT revenue.
- [Column H] "SLC Revenue at \$5.00 Cap" is "Total Lines" multiplied by "Effective SLC" or $([D] * [G] * 12)$
- [Column I] "Potential Contribution at \$5.00 Cap" is "SLC Revenue at \$5.00 Cap" minus "Economic Cost" or $([H] - [F])$ (positive values only)
- [Column J] "Subsidy Required at \$5.00 Cap" = "Economic Cost" minus "SLC Revenue at \$5.00 Cap" of $([F] - [H])$ (positive values only)
- [Column K] "Net Contribution at \$5.00 Cap" was calculated by subtracting "Subsidy Required at \$5.00 Cap" from "Contribution at \$5.00 Cap" or $([J] - [I])$ The sum of this column [\$635,061,517.35] is the amount consumers are currently overpaying for interstate access exclusive of the interstate access fund.

NASUCA estimated that subscribers receive \$472 million⁴ in support when the residential and single-line business SLC cap is at \$5.00. These estimates were for 76 study areas identified as price cap, non-rural study areas with UNE zones formed from a group of wire centers.

In addition to these 76 study areas, another 105 study areas are governed by the rules adopted in the CALLS Order. These 105 study areas include four price cap non-rural study areas with UNE zones below the wire center level, and 101 rural price cap study areas. These study areas receive \$157 million in interstate access support.⁵

² The following description applies to Table A "Net Contribution of SLC at \$5.00". However, this general methodology is equally applicable to Tables A through E as the tables only differ by the application of different SLC caps and the way in which the observations were aggregated (i.e. by zone vs. carrier)

³ The interstate portion of this cost was calculated using the gross interstate allocator (25%) and carrier specific Dial Equipment Minutes (DEM) allocators.

⁴ See Column J

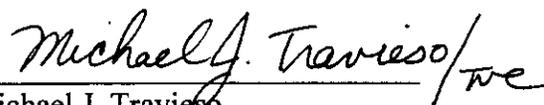
⁵ http://www.universalservice.org/overview/filings/20012q/HC06_2001_IAS_by_Study_Area.xls

Adding the \$157 million current funding for study areas for which there is no zone forward-looking cost estimate to the \$472 million support estimate for the 76 study areas with zone forward-looking cost estimates generates NASUCA's the maximum sufficient support estimate of \$629 million.⁶

NASUCA estimated that non-rural subscribers receive \$252 million in support when the residential and single-line business SLC cap is at \$6.50. To determine the overall maximum sufficient support estimate if the SLC were allowed to increase to \$6.50, NASUCA multiplies the \$629 million estimate by the ratio of \$252 million and \$472 million, yielding \$336 million. This calculation reduces the support to study areas without forward-looking zone cost estimates by the same percentage reduction in support that study areas with forward-looking zone cost estimates will receive.

Prepared By:
David Gabel, PhD
Professor, Queens College

Respectfully submitted,


Michael J. Travieso
People's Counsel

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⁶ Our support estimate of \$629 million, based on a \$5.00 SLC, can be obtained by adding cell K213 from TAB "\$5.00 Z" to cell K48 from TAB "Rural Carriers" in the attached Excel workbook.

**TABLE A – NET CONTRIBUTION OF SLC AT
\$5.00 [BY ZONE/STATE/CARRIER]**

PROPRIETARY

**TABLE B – NET CONTRIBUTION OF SLC AT
\$6.50 [BY ZONE/STATE/CARRIER]**

PROPRIETARY

Table C - Net Contribution of SLC at \$5.00 [By Carrier] Page 1 of 2

A	B	C	D	E
SAC Code	Carrier	Contribution at \$5.00 Cap	Subsidy at \$5.00 Cap	Net Contribution at \$5.00 Cap
175000	Bell Of Pennsylvania	48,332,602	1,655,536	46,677,066
185030	C And P Tel Co Of Md	31,882,064	3,419,107	28,462,956
195040	C And P Tel Co Of Va	31,105,818	10,301,572	20,804,246
205050	C And P Tel Co Of W Va	1,515,232	16,098,596	(14,583,364)
575020	C And P Telephone Company Of Wa Dc	3,219,108	-	3,219,108
552348	Central Telephone Company - Nevada	6,005,193	250,971	5,754,222
265061	Cincinnati Bell-Ky	1,348,373	1,331,639	16,734
305062	Cincinnati Bell-Ohio	6,262,134	699,463	5,562,670
421922	Contel Missouri DbA Gte Missouri	-	9,317,294	(9,317,294)
542302	Contel Of California-California	-	4,310,662	(4,310,662)
341036	Contel Of Illinois Inc DbA Gte - Illinois	-	7,921,700	(7,921,700)
320779	Contel Of Indiana Inc DbA Gte - Indiana	-	5,911,050	(5,911,050)
230509	Contel Of North Carolina DbA Gte No Carolina	-	3,637,749	(3,637,749)
442154	Contel Of Texas Inc DbA Gte Texas	-	5,892,120	(5,892,120)
250281	Contel Of The South DbA Gte South	-	7,931,958	(7,931,958)
190233	Contel Of Virginia Inc DbA Gte Virginia	1,918,719	9,013,007	(7,094,288)
565010	Diamond State Tel Co	4,639,225	1,192,488	3,446,736
250293	Gte And Contel Of Alabama	-	5,019,474	(5,019,474)
210328	GTE Floridainc	18,637,346	1,905	18,635,441
623100	Gte Hawaiian Telephone Co Inc	8,864,820	55,421	8,809,399
421186	Gte North Inc - Missouri	696,683	946,798	(250,115)
310695	Gte North Inc-Mi	-	17,391,048	(17,391,048)
300615	Gte North Inc-Oh	-	19,851,412	(19,851,412)
170169	Gte North Inc-Pa And Contel	2,396,181	5,156,506	(2,760,325)
330886	Gte North Inc-Wi	-	15,942,826	(15,942,826)
522416	Gte Northwest Inc - Washington	7,019,444	2,953,562	4,065,882
522449	GTE NW-WA (Contel)	20,690	2,145,501	(2,124,811)
542319	Gte Of California	55,242,646	-	55,242,646
341015	Gte Of Illinois	-	10,956,212	(10,956,212)
320772	Gte Of Indiana	-	3,700,850	(3,700,850)
532416	Gte Of The Northwest	3,486,793	3,305,920	180,873
260407	Gte South Inc - Kentucky	905,827	7,642,376	(6,736,549)
230479	Gte South Inc - North Carolina	1,137,693	-	1,137,693
240479	Gte South Inc - South Carolina	-	1,367,084	(1,367,084)
442080	Gte Southwest Inc - Texas	13,708,450	10,059,941	3,648,508
345070	Illinois Bell Tel Co	39,024,755	6,619,592	32,405,163
325080	Indiana Bell Tel Co	16,682,359	5,897,895	10,784,464
371568	Lincoln Tel And Tele Co	1,104,770	5,062,039	(3,957,269)
315090	Michigan Bell Tel Co	40,714,896	16,642,913	24,071,983

Table C - Net Contribution of SLC at \$5.00 [By Carrier] Page 2 of 2

A	B	C	D	E
SAC Code	Carrier	Contribution at \$5.00 Cap	Subsidy at \$5.00 Cap	Net Contribution at \$5.00 Cap
475103	Mountain Bell-Idaho	-	279,762	(279,762)
495105	Mountain Bell-New Mexico	4,624,686	2,831,349	1,793,337
505107	Mountain Bell-Utah	12,448,452	-	12,448,452
555173	Nevada Bell	3,654,354	1,495,567	2,158,786
115112	New England Tel-Ma	40,972,180	3,863,739	37,108,441
105111	New England Tel-Maine	1,176,787	11,208,306	(10,031,519)
125113	New England Tel-Nh	2,493,849	5,187,281	(2,693,433)
585114	New England Tel-Ri	6,576,739	542,392	6,034,347
145115	New England Tel-Vt	445,168	7,326,998	(6,881,830)
165120	New Jersey Bell	61,498,562	-	61,498,562
155130	New York Tel	97,454,295	2,812,085	94,642,210
355141	Northwestern Bell-Ia	8,188,610	3,244,381	4,944,229
365142	Northwestern Bell-Minnesota	16,757,149	-	16,757,149
375143	Northwestern Bell-Nebraska	4,389,129	3,194,173	1,194,956
385144	Northwestern Bell-North Dakota	2,608,022	1,099,379	1,508,643
395145	Northwestern Bell-South Dakota	1,614,639	1,383,926	230,713
305150	Ohio Bell Tel Co	38,171,744	6,249,760	31,921,983
545170	Pacific Bell	141,927,745	14,694,429	127,233,316
535163	Pacific Northwest Bell-Oregon	11,234,365	4,346,625	6,887,739
525161	Pacific Northwest Bell-Washington	20,348,165	-	20,348,165
150121	Rochester Telephone Corp	6,962,469	-	6,962,469
255181	South Central Bell-Al	3,114,194	22,143,292	(19,029,098)
265182	South Central Bell-Ky	5,183,041	17,392,336	(12,209,295)
275183	South Central Bell-La	14,265,333	21,130,993	(6,865,660)
285184	South Central Bell-Mississippi	-	32,612,909	(32,612,909)
295185	South Central Bell-Tn	7,685,052	14,664,493	(6,979,441)
215191	Southern Bell-FL	61,301,983	4,994,748	56,307,236
225192	Southern Bell-Ga	30,819,891	8,498,598	22,321,292
235193	Southern Bell-Nc	11,044,426	-	11,044,426
245194	Southern Bell-Sc	4,926,364	7,874,293	(2,947,929)
135200	Southern New England Tel	11,925,724	3,456,094	8,469,631
405211	Southwestern Bell-Arkansas	1,745,636	6,376,419	(4,630,783)
415214	Southwestern Bell-Kansas	9,117,210	4,146,055	4,971,155
425213	Southwestern Bell-Missouri	14,110,349	9,457,685	4,652,664
435215	Southwestern Bell-Oklahoma	4,939,923	7,386,682	(2,446,758)
445216	Southwestern Bell-Texas	81,272,069	12,925,990	68,346,079
335220	Wisconsin Bell	17,221,950	605,623	16,616,327

Totals 1,108,092,072 473,030,555 635,061,517

Table D - Net Contribution of SLC at \$6.50 [By Carrier] Page 1 of 2

A	B	C	D	E
SAC Code	Carrier	Contribution at \$6.50 Cap	Subsidy at \$6.50 Cap	Net Contribution at \$6.50 Cap
250281	Contel Of The South DbA Gte South	-	5,970,732	(5,970,732)
250293	Gte And Contel Of Alabama	778,669	3,283,328	(2,504,658)
255181	South Central Bell-AI	19,244,048	11,958,730	7,285,318
405211	Southwestern Bell-Arkansas	5,426,485	4,758,997	667,488
542302	Contel Of California-California	872,276	-	872,276
542319	Gte Of California	115,373,518	-	115,373,518
545170	Pacific Bell	141,927,745	14,694,429	127,233,316
135200	Southern New England Tel	24,538,869	1,874,407	22,664,462
575020	C And P Telephone Company Of Wa Dc	3,219,108	-	3,219,108
565010	Diamond State Tel Co	9,968,872	-	9,968,872
210328	GTE Floridainc	50,255,753	-	50,255,753
215191	Southern Bell-FL	144,347,863	2,181,528	142,166,336
225192	Southern Bell-Ga	74,436,080	-	74,436,080
623100	Gte Hawaiian Telephone Co Inc	18,371,557	-	18,371,557
355141	Northwestern Bell-la	19,495,040	893,095	18,601,945
475103	Mountain Bell-Idaho	6,270,258	-	6,270,258
341036	Contel Of Illinois Inc DbA Gte - Illinois	-	4,865,786	(4,865,786)
341015	Gte Of Illinois	-	714,248	(714,248)
345070	Illinois Bell Tel Co	39,024,755	6,619,592	32,405,163
320779	Contel Of Indiana Inc DbA Gte - Indiana	-	3,050,400	(3,050,400)
320772	Gte Of Indiana	7,353,688	-	7,353,688
325080	Indiana Bell Tel Co	22,945,338	2,600,464	20,344,873
415214	Southwestern Bell-Kansas	11,653,138	3,795,264	7,857,875
265061	Cincinnati Bell-Ky	1,717,931	934,041	783,890
260407	Gte South Inc - Kentucky	5,199,403	5,488,550	(289,147)
265182	South Central Bell-Ky	15,271,087	10,754,854	4,516,233
275183	South Central Bell-La	35,048,601	10,440,667	24,607,934
115112	New England Tel-Ma	90,069,621	21,325	90,048,296
185030	C And P Tel Co Of Md	49,274,590	1,137,620	48,136,969
105111	New England Tel-Maine	4,940,167	5,576,839	(636,672)
310695	Gte North Inc-Mi	-	6,402,174	(6,402,174)
315090	Michigan Bell Tel Co	50,814,119	12,896,202	37,917,917
365142	Northwestern Bell-Minnesota	43,620,763	-	43,620,763
421922	Contel Missouri DbA Gte Missouri	967,966	7,347,095	(6,379,129)
421186	Gte North Inc - Missouri	1,751,987	734,830	1,017,157
425213	Southwestern Bell-Missouri	15,507,047	8,893,721	6,613,326
285184	South Central Bell-Mississippi	4,955,385	19,731,878	(14,776,493)
230509	Contel Of North Carolina DbA Gte No Carolina	-	1,566,813	(1,566,813)
230479	Gte South Inc - North Carolina	3,754,425	-	3,754,425

Table D - Net Contribution of SLC at \$6.50 [By Carrier] Page 2 of 2

A	B	C	D	E
SAC Code	Carrier	Contribution at \$6.50 Cap	Subsidy at \$6.50 Cap	Net Contribution at \$6.50 Cap
235193	Southern Bell-Nc	41,978,632	-	41,978,632
385144	Northwestern Bell-North Dakota	5,284,496	754,679	4,529,817
371568	Lincoln Tel And Tele Co	1,104,770	5,062,039	(3,957,269)
375143	Northwestern Bell-Nebraska	9,664,749	1,829,755	7,834,994
125113	New England Tel-Nh	9,121,311	1,511,987	7,609,325
165120	New Jersey Bell	121,850,041	-	121,850,041
495105	Mountain Bell-New Mexico	12,816,267	-	12,816,267
552348	Central Telephone Company - Nevada	6,005,193	250,971	5,754,222
555173	Nevada Bell	6,233,926	1,282,577	4,951,349
155130	New York Tel	231,024,347	-	231,024,347
150121	Rochester Telephone Corp	6,962,469	-	6,962,469
305062	Cincinnati Bell-Ohio	8,239,403	612,510	7,626,893
300615	Gte North Inc-Oh	-	5,946,700	(5,946,700)
305150	Ohio Bell Tel Co	48,460,498	3,779,957	44,680,541
435215	Southwestern Bell-Oklahoma	4,939,923	7,386,682	(2,446,758)
532416	Gte Of The Northwest	9,102,919	2,255,188	6,847,731
535163	Pacific Northwest Bell-Oregon	27,046,087	2,491,473	24,554,613
175000	Bell Of Pennsylvania	99,112,398	-	99,112,398
170169	Gte North Inc-Pa And Contel	6,272,733	1,053,550	5,219,183
585114	New England Tel-Ri	15,500,562	-	15,500,562
240479	Gte South Inc - South Carolina	1,184,470	-	1,184,470
245194	Southern Bell-Sc	18,647,435	2,136,212	16,511,223
395145	Northwestern Bell-South Dakota	3,712,165	-	3,712,165
295185	South Central Bell-Tn	36,249,744	6,335,215	29,914,529
442154	Contel Of Texas Inc DbA Gte Texas	-	4,255,164	(4,255,164)
442080	Gte Southwest Inc - Texas	30,602,044	5,117,681	25,484,362
445216	Southwestern Bell-Texas	101,713,181	7,242,040	94,471,141
505107	Mountain Bell-Utah	16,551,691	-	16,551,691
195040	C And P Tel Co Of Va	64,555,740	3,465,118	61,090,622
190233	Contel Of Virginia Inc DbA Gte Virginia	6,573,981	5,911,151	662,830
145115	New England Tel-Vt	2,358,684	4,694,956	(2,336,272)
522416	Gte Northwest Inc - Washington	15,700,106	988,520	14,711,586
525161	Pacific Northwest Bell-Washington	34,000,456	-	34,000,456
522449	GTE NW-WA (Contel)	408,003	1,330,558	(922,555)
330886	Gte North Inc-Wi	-	8,090,686	(8,090,686)
335220	Wisconsin Bell	18,108,630	247,301	17,861,329
205050	C And P Tel Co Of W Va	5,859,334	8,946,116	(3,086,782)

Totals 2,065,342,537 252,166,395 1,813,176,142

Table E - Rural Support Required [By Carrier Type/Study Area Name/State] Page 1 of 1

State	SAC	Study Area Name	Carrier Type	Support	State	SAC	Study Area Name	Carrier Type	Support
AZ	455101	QWEST CORP-AZ	N	\$ -	IL	341073	FRONTIER-PRAIRIE	R	\$ -
CO	465102	QWEST CORP-CO	N	\$ 16,345,008.00	IL	341079	FRONTIER-SCHUYLER	R	\$ -
MT	485104	QWEST CORP-MT	N	\$ 29,664.00	NY	150122	FRONTIER-SENECA GORH	R	\$ 161,340.00
WY	515108	QWEST CORP-WY	N	\$ 5,623,992.00	NY	150128	FRONTIER-SYLVAN LAKE	R	\$ 401,760.00
OK	431165	VALOR-OK	N	\$ 1,836,732.00	IN	320828	FRONTIER-THORNTOWN	R	\$ -
NC	230470	CAROLINA TEL & TEL	R	\$ -	WI	330964	FRONTIER-WISCONSIN	R	\$ -
CA	543402	CITIZENS GOLDN STATE	R	\$ 789,144.00	IA	351178	ITS - IOWA TELECOM	R	\$ 4,724,400.00
NV	554431	Citizens NV-North	R	\$ 1,668,984.00	IA	351167	ITS-IOWA TELECOM-NO	R	\$ 2,761,020.00
NV	554432	Citizens NV-South	R	\$ 21,060.00	IA	351170	ITS-IOWA TELECOM-SYS	R	\$ -
ID	474427	CITIZENS TELECOM-ID	R	\$ 1,345,392.00	MP	653700	MICRONESIAN TELECOMM	R	\$ 247,752.00
IL	341183	CITIZENS TELECOMM-IL	R	\$ -	AZ	454449	NAVAJO COMMUN-AZ	R	\$ 1,839,876.00
ND	381131	Citizens Telecomm-ND	R	\$ -	NM	494449	NAVAJO COMMUN-NM	R	\$ 714,984.00
NY	154532	CITIZENS TELECOM-NY	R	\$ 5,424,480.00	UT	504449	NAVAJO COMMUN-UT	R	\$ 125,112.00
UT	504429	CITIZENS TELECOM-UT	R	\$ 831,000.00	NY	150110	OGDEN TEL CO	R	\$ -
CA	544342	CITIZENS TUOLUMNE	R	\$ 703,860.00	ID	475162	QWEST CORP-IDAHO	R	\$ -
CA	542308	CITIZENS UTIL OF CA	R	\$ 3,946,596.00	WI	330870	RHINELANDER(CRANDON)	R	\$ 206,808.00
AZ	452172	CITIZENS UTILITIES	R	\$ 781,980.00	WI	330891	RHINELANDER(HEADWTR)	R	\$ 2,736.00
MN	361123	CITIZENS-MN-LAKES	R	\$ 2,139,420.00	WI	330940	RHINELANDER(RHINLDR)	R	\$ -
MN	367123	CITIZENS-MN-SOUTH	R	\$ -	WI	330941	RHINELANDER(RIB LKE)	R	\$ 59,520.00
MT	484322	CITIZENS-MONTANA	R	\$ 473,244.00	FL	210341	SPRINT-FLORIDA, INC.	R	\$ 18,956,520.00
NE	371128	CITIZENS-NE-FT KEARN	R	\$ 869,004.00	TN	290567	UNITED INTER-MT-TN	R	\$ 2,072,148.00
OR	533401	CITIZENS-OREGON	R	\$ 859,872.00	VA	190567	UNITED INTER-MT-VA	R	\$ 5,657,220.00
NY	154533	CITIZENS-RED HOOK	R	\$ -	NJ	160138	UNITED TEL - NJ, INC	R	\$ 357,612.00
TN	290580	CITIZENS-VOLUNTEER	R	\$ -	IN	320832	UTC OF INDIANA	R	\$ 2,769,828.00
NY	154534	CITIZENS-WEST. CNTY	R	\$ 827,508.00	KS	411842	UTC OF KANSAS	R	\$ 6,261,684.00
AZ	454426	CITIZENS-WHITE MTNS.	R	\$ 1,512,060.00	MN	361456	UTC OF MINNESOTA	R	\$ 1,495,812.00
WV	204339	CTC WVA-BLUEFIELD	R	\$ 3,056,952.00	MO	421957	UTC OF MISSOURI	R	\$ 6,609,516.00
WV	200271	CTC WVA-MTN. STATE	R	\$ 3,105,204.00	OH	300661	UTC OF OHIO	R	\$ -
WV	204338	CTC WVA-ST MARY'S	R	\$ 1,689,144.00	PA	170209	UTC OF PENNSYLVANIA	R	\$ 6,516,492.00
TN	294336	CUC DBA CITIZENS-TN	R	\$ 19,488.00	TX	442084	UTC OF TEXAS INC	R	\$ 9,936,432.00
NY	150100	FRONTIER COMM OF NY	R	\$ -	SC	240506	UTC OF THE CAROLINAS	R	\$ 1,621,548.00
AL	250306	FRONTIER COMM.-AL	R	\$ 260,232.00	OR	532400	UTC OF THE NW - OR	R	\$ 964,740.00
AL	250318	FRONTIER COMM-SOUTH	R	\$ 489,192.00	WA	522400	UTC OF THE NW-WA	R	\$ 1,875,600.00
FL	210318	FRONTIER COMM-SOUTH	R	\$ 111,360.00	NE	371595	UTC OF THE WEST-NE	R	\$ 286,032.00
IL	341038	FRONTIER OF ILLINOIS	R	\$ -	WY	511595	UTC OF THE WEST-WY	R	\$ 436,476.00
IA	351127	FRONTIER OF IOWA	R	\$ 181,020.00	NM	491164	VALOR-NM#1	R	\$ 1,174,692.00
IL	341011	FRONTIER OF LAKESIDE	R	\$ 504.00	NM	491193	VALOR-NM#2	R	\$ 2,610,276.00
NY	150072	FRONTIER-AUSABLE VAL	R	\$ 408,984.00	TX	441163	VALOR-TX	R	\$ -
PA	170149	FRONTIER-BREEZEWOOD	R	\$ 82,512.00	AZ	452302	VERIZON CALIF-AZ	R	\$ 191,328.00
PA	170152	FRONTIER-CANTON	R	\$ 19,896.00	NV	552302	VERIZON CALIF-NV	R	\$ 2,377,128.00
GA	220362	FRONTIER-FAIRMOUNT	R	\$ 228,588.00	PA	170170	VERIZON N-PA(CONTEL)	R	\$ 3,724,008.00
PA	170178	FRONTIER-LAKEWOOD	R	\$ -	ID	472416	VERIZON N'WEST-ID	R	\$ 12,612,408.00
MI	310682	FRONTIER-MICHIGAN	R	\$ -	KY	260410	VERIZON S-KY(CONTEL)	R	\$ 592,200.00
IL	341055	FRONTIER-MIDLAND	R	\$ 163,488.00	VA	190479	VERIZON SOUTH-VA	R	\$ 549,732.00
MN	361367	FRONTIER-MINNESOTA	R	\$ -	CA	542344	VERIZON W-COAST-CA	R	\$ -
OH	300682	FRONTIER-MI-OH	R	\$ -					
WI	330912	FRONTIER-MONDOVI	R	\$ -					
IL	341061	FRONTIER-MT. PULASKI	R	\$ -					
IL	341067	FRONTIER-ORION	R	\$ -					
PA	170194	FRONTIER-OSWAYO RIVR	R	\$ 51,048.00					
PA	170168	FRONTIER-PA	R	\$ -					

Total \$ 156,791,352.00

NOTES
 Carrier Type: R = Rural N = Non-rural
 Support is for Second Quarter of 2002
 Figures may not add up due to rounding