August 22, 2002

Eschelon Telecom, Inc.
730 2nd Avenue South
Suite 1200
Minneapolis, MN 55402

David Kunde
Executive Vice President

Dear Dave,

As requested by Eschelon, CGM performed a series of test calls and supporting analysis to determine whether or not all of the appropriate and applicable call records were being recorded and received at Eschelon for the purposes of Carrier Access Billing.

In total, we made and recorded 4,362 test calls. Calls were made in the following product areas: ONNET terminating (usage terminating to Eschelon's switches), UNE-E & UNE-P. The number of test calls by type does not represent the actual mix of calls originated or terminated by Eschelon customers, but the mix of test calls made was established so that a large enough sample could be gathered to perform data analysis. The unmatched percentage by type should be compared to Eschelon's actual call type distribution to estimate the actual missing calls and minutes across the Eschelon base of customers.

The test calling was conducted during April and May, 2002, and since that time, call record data has been received from Qwest and reviewed. The request to perform the test calling and subsequent analysis was done to augment a smaller sample of calling that was performed last year by PricewaterhouseCoopers. The services of three companies were utilized in this project, CCG Consulting, Inc of Riverdale, MD, CSS of Austin TX, and CGM, LLC of Atlanta, GA. All of these companies were experienced in the areas of Access Billing, Process Review and Control as it relates to telecommunications, and test calling. The combined resources assigned to this project have many years experience in telecommunications.

Attached are our findings to date, along with a brief synopsis of the test calling and data analysis process.

1. **Conclusions:**

a. In general, it is our conclusion that approximately 22% of the calls made for which Qwest was responsible for providing access records still remain unaccounted for at this time. By unaccounted for, we mean that we can't find a suitable match between the test call made by one of the testers and an EMR record submitted by Qwest to Eschelon for billing.

b. We undertook a detailed review of the process by which Eschelon requests, receives and processes records of these types for billing, and based on this review, we believe it unlikely that an error in the Eschelon processing would account for the missing records. Based on our analysis, we can find no evidence that these calls were sent by Qwest to Eschelon for processing.

c. Specifically, 15% of originating calls (calls that were originated from "test" numbers) were unmatched while 85% were matched.

d. Thirty-three percent (33%) of terminating test calls (calls that were terminated to "test" numbers) were unmatched while 67% were matched.

e. The over all percentage of matched minutes (84%) was consistently higher than the percentage of matched calls (78%). (See table below) This is consistent with the finding that, on average, we were able to find longer duration calls for matching, most notably on terminating calls.

f. These results are consistent across locations, CLLI's, and Service Types, although:

1. Centrex Plus Non-Matches are 25.3%, as opposed to 20.5% on other Service Types.
2. Intra LATA calls were un-matched at 36.0%, which was approximately twice the un-matched rate of Inter LATA Calls. No test calls were made from or terminated to lines that were pre-subscribed to Qwest IntraLATA toll.
3. Matching varied greatly by Dialing Pattern, as the table below shows:

	Percent Of Calls		Percent Of Duration	
Dialing Pattern	Matched	Un-Matched	Matched	Un-Matched
800 Total	67.0%	33.0%	64.7%	35.3%
1+ Total	78.5%	21.5%	83.3%	16.7%
1010XXX Total	81.1%	18.9%	85.6%	14.4%
Calling Card Total	84.1%	15.9%	93.1%	6.9%
DA Total	36.6%	63.4%	27.3%	72.7%
Operator Total	72.2%	27.8%	84.1%	15.9%
Grand Total	**77.9%**	**22.1%**	**84.3%**	**15.7%**

2. Process Overview:

a. Test Calls were made from designated test numbers that were ordered and provisioned through normal channels, but which were designated for test calling. These test numbers were identical in configuration to other numbers of similar types of telephone service. A brief summary of the quantity and type of test calls made appears below:

Type	Direction	Test Calls Made
ON-NET	Terminating	478
UNE-E	Originating	1,259
	Terminating	972
UNE-P	Originating	1,367
	Terminating	286
		4,362

b. Calls were made to and from these test numbers, and the durations of these test calls were recorded with stop watches.

c. Test Calls were made from multiple locations within a region, and each region represented a different Qwest data processing center region.

d. At the conclusion of the testing, all calls were assembled into a master database of test calls.

e. Call Data was then received from Qwest as a part of the normal business process that exists today to facilitate the rating and billing of these types of calls. (In the case where Eschelon was required to submit a list of numbers to Qwest (UNE-E), the test numbers were included in the normal request process.)

f. The call data received from Qwest was analyzed to see if a corresponding Call record in the test call database could be matched to the incoming call records received from Qwest. The Summary Results of that matching is listed below:

g. A successful match was one in which call date, from number, to number were, at minimum the same between test and target calls.

h. Access records were received for the time period April through July to allow for delayed usage to be delivered and analyzed.

2. Test Call Summary:

Call Direction	Test Calls Made		Test Calls Matched		Percent Matched	
	Calls	Minutes	Calls	Minutes	Calls	Minutes
Originating	2,626	3,987	2,230	3,446	84.9%	86.4%
Terminating	1,736	2,786	1,168	2,266	67.3%	81.4%
Total	4,362	6,773	3,398	5,712	77.9%	84.3%

3. Test Call Summary by Provisioning Type:

		Test Calls			
Provisioning Type	Call Direction	Matched	Unmatched	Grand Total	Matched PCT
ON-NET	Terminating	334	144	478	69.9%
ON-NET Total		334	144	478	69.9%
UNE-E	Originating	1135	124	1259	90.2%
	Terminating	638	334	972	65.6%
UNE-E Total		1773	458	2231	79.5%

		Test Calls			
Provisioning Type	**Call Direction**	Matched	Unmatched	Grand Total	Matched PCT
UNE-P	Originating	1095	272	1367	80.1%
	Terminating	196	90	286	68.5%
UNE-P Total		**1291**	**362**	**1653**	**78.1%**
Grand Total		3398	964	4362	**77.9%**

Please do not hesitate to contact me with questions regarding this project.

Sincerely,

Kevin Murphy
CGM, LLC
President

Cc:
Bill Markert – Eschelon
Jack Mungia – Eschelon
Jeff Oxley - Eschelon
Tim Brown – CCG
Gary Comfort – CGM
Marnell Robertson – CSS

1. **Test Call Locations Summary**

Test calling was conducted at the locations and to and from the numbers as listed below:

Location	CLLI	Test Number	Test Service Type	Tests Interval
Bellevue, WA	BLLVWASHDS0	425-289-2630	On-net (Terminating)	4/1-3/2002
		425-378-2725	UNE-E 1FB	4/2/2002
		425-401-7248	UNE-E Centrex+	
		425-378-8355	On-net	4/30/2002
		425-378-2725	UNE-P 1FB	
		425-401-7248	UNE-P Centrex+	
Seattle, WA	STTLWALADS0	206-957-2630	On-net (Terminating)	4/1-3/2002
		206-985-5808	UNE-E Centrex+	4/3/2002
Seattle, WA	STTLWA06DS4	206-957-2631	On-net	4/1-3/2002
		206-621-1537	UNE-E 1FB	4/4/2002
		206-903-1566	UNE-E Centrex 21	
		206-332-9377	UNE-E Centrex+	4/5/2002
		206-332-9378	On-net (Terminating)	5/1/2002
		206-621-1537	UNE-P 1FB	
		206-903-1566	UNE-P Centrex 21	
		206-332-9377	UNE-P Centrex+	
Seattle, WA	STTLWAWEDS0	206-957-2632	On-net (Terminating)	4/1-3/2002
		206-923-0176	UNE-E 1FB	4/3/2002
		206-932-2859	UNE-E Centrex 21	
		206-923-0176	UNE-P 1FB	5/2/2002
		206-932-2859	UNE-P Centrex 21	

Location	CLLI	Test Number	Test Service Type	Tests Interval
Tacoma, WA	TACMWALEDS1	253-682-2630	On-net (Terminating)	4/1-2/2002
		253-536-4871	UNE-E 1FB	4/4/2002
		253-536-4871	UNE-P 1FB	4/29/2002
		253-531-5805	UNE-P Centrex 21	
Minneapolis, MN	MPLSMNDT62G	612-436-2629	On-net (Terminating)	4/15 & 16/2002
		612-339-2411	UNE-E 1FB	
		612-333-7371	UNE-E Centrex 21	
		612-335-9381	UNE-E Centrex+	
		612-339-2418	On-net (Terminating)	5/13/2002
		612-339-2411	UNE-P 1FB	
		612-333-7371	UNE-P Centrex 21	
		612-335-9381	UNE-P Centrex+	
Minneapolis, MN	MPLSMNDTDS7	612-436-2630	On-net (Terminating)	4/15 & 16/2002
		612-338-5108	UNE-E 1FB	4/16 & 17/2002
		612-215-1241	UNE-E Centrex 21	
		612-338-5120	UNE-E Centrex+	
		612-215-1242	On-net (Terminating)	5/14/2002
		612-338-5108	UNE-P 1FB	
		612-215-1241	UNE-P Centrex 21	
		612-338-5120	UNE-P Centrex+	
Bloomington, MN	BLTNMNSODS0	952-345-5630	On-net (Terminating)	4/15/2002
		952-888-0519	UNE-E 1FB	4/17 & 18/2002
		952-884-1950	UNE-E Centrex 21	

Location	CLLI	Test Number	Test Service Type	Tests Interval
		952-703-5285	UNE-E Centrex+	
		952-888-0672	On-net (Terminating)	5/16/2002
		952-888-0519	UNE-P 1FB	
		952-884-1950	UNE-P Centrex 21	
		952-703-5285	UNE-P Centrex+	
St Paul, MN	STPLMNMIDS0	651-287-3630	On-net (Terminating)	
		651-444-5567	UNE-E 1FB	4/18/2002
		651-644-3780	UNE-E Centrex 21	
		651-999-4992	UNE-E Centrex+	
		651-999-4993	On-net (Terminating)	5/15/2002
		651-644-5567	UNE-P 1FB	
		651-644-3780	UNE-P Centrex 21	
		651-999-4992	UNE-P Centrex+	
Golden Valley, MN	GLVYMNORDS0	763-398-2630	On-net (Terminating)	
		952-546-0703	UNE-E 1FB	4/19/2002
		952-545-0450	UNE-E Centrex 21	
		952-543-3951	UNE-E Centrex+	
		952-545-0453	On-net (Terminating)	5/17/2002
		952-546-0703	UNE-P 1FB	
		952-545-0450	UNE-P Centrex 21	
		952-453-3951	UNE-P Centrex+	
Arvada, CO	ARVDCOMADS0	303-996-2630	On-net (Terminating)	4/22/2002
		303-456-5541	UNE-E 1FB	4/23/2002
		303-425-4514	UNE-E Centrex 21	

Location	CLLI	Test Number	Test Service Type	Tests Interval
		303-403-1867	UNE-E Centrex+	
		606-456-5542	On-net (Terminating)	5/20/2002
		303-456-5541	UNE-P 1FB	
		303-425-4514	UNE-P Centrex 21	
Denver, CO	DNVRCODCDS0	303-996-2631	On-net (Terminating)	4/22/2002
		720-482-4007	UNE-E 1FB	
		720-482-1025	UNE-E Centrex 21	
		720-482-1025	On-net (Terminating)	5/21/2002
		720-482-4007	UNE-P 1FB	
		720-482-1003	UNE-P Centrex 21	
Lakewood, CO	LKWDCOMADS0	303-996-2632	On-net (Terminating)	
		303-462-3614	UNE-E 1FB	4/24/2002
		303-238-8524	UNE-E Centrex 21	
		720-544-8523	UNE-E Centrex+	
		720-544-8524	On-net (Terminating)	5/22/2002
		303-462-3614	UNE-P 1FB	
		303-238-8254	UNE-P Centrex 21	
		720-544-8523	UNE-P Centrex+	
Denver, CO	DNVRCOMADS4	303-996-2633	On-net (Terminating)	4/22 & 26/2002
		720-944-0933	UNE-E Centrex 21	4/26/2002
		720-944-0933	UNE-P Centrex+	5/24/2002
Denver, CO	DNVRCOWSDS0	303-996-2634	On-net (Terminating)	4/22 & 26/2002
		303-934-4010	UNE-E 1FB	4/25/2002

Location	CLLI	Test Number	Test Service Type	Tests Interval
		303-922-6341	UNE-E Centrex 21	
		720-884-0544	UNE-E Centrex+	
		303-934-4157	On-net (Terminating)	5/23/2002
		303-934-4010	UNE-P 1FB	
		303-922-6341	UNE-P Centrex 21	
		720-884-0544	UNE-P Centrex+	

1. **Matching Results By Service Type**

			Matched		Un-Matched		Total		Matched Percent		UN Matched Percent	
Service Type	**Direction**	**Call Type**	**Calls**	**Duration**	**Calls**	**Duration**	**Calls**	**Duration**	**Calls**	**Duration**	**Calls**	**Duration**
1FB	**Originating**	DA	4	2,086	7	3,552	11	5,638	36.4%	37.0%	63.6%	63.0%
		DACC	-	-	9	9,421	9	9,421	0.0%	0.0%	100.0%	100.0%
		Inter800	4	388	-	-	4	388	100.0%	100.0%	0.0%	0.0%
		InterLATA/Inter	494	506,767	21	15,303	515	522,070	95.9%	97.1%	4.1%	2.9%
		InterLATA/Intra	202	170,114	12	8,906	214	179,020	94.4%	95.0%	5.6%	5.0%
		IntraLATA/Intra	122	99,774	62	46,990	184	146,764	66.3%	68.0%	33.7%	32.0%
		QLRN	4	4,822	-	-	4	4,822	100.0%	100.0%	0.0%	0.0%
		RNA	4	513	-	-	4	513	100.0%	100.0%	0.0%	0.0%
	Originating Total		**834**	**784,464**	**111**	**84,172**	**945**	**868,636**	**88.3%**	**90.3%**	**11.7%**	**9.7%**
	Terminating	InterLATA/Inter	355	436,651	147	49,888	502	486,539	70.7%	89.7%	29.3%	10.3%
		InterLATA/Intra	132	146,045	51	16,181	183	162,226	72.1%	90.0%	27.9%	10.0%
		IntraLATA/Intra	92	98,698	76	66,713	168	165,411	54.8%	59.7%	45.2%	40.3%
	Terminating Total		**579**	**681,394**	**274**	**132,782**	**853**	**814,176**	**67.9%**	**83.7%**	**32.1%**	**16.3%**
1FB Total			**1,413**	**1,465,858**	**385**	**216,954**	**1,798**	**1,682,812**	**78.6%**	**87.1%**	**21.4%**	**12.9%**

			Matched		Un-Matched		Total		Matched Percent		UN Matched Percent	
Service Type	**Direction**	**Call Type**	**Calls**	**Duration**	**Calls**	**Duration**	**Calls**	**Duration**	**Calls**	**Duration**	**Calls**	**Duration**
Centrex 21	**Originating**	DA	2	1,062	6	3,343	8	4,405	25.0%	24.1%	75.0%	75.9%
		DACC	-	-	9	8,820	9	8,820	0.0%	0.0%	100.0%	100.0%
		Inter800	3	276	-	-	3	276	100.0%	100.0%	0.0%	0.0%
		InterLATA/Inter	444	414,050	32	32,658	476	446,708	93.3%	92.7%	6.7%	7.3%
		InterLATA/Intra	176	141,055	24	23,346	200	164,401	88.0%	85.8%	12.0%	14.2%
		IntraLATA/Intra	132	124,241	47	29,890	179	154,131	73.7%	80.6%	26.3%	19.4%
		QLRN	2	4,068	-	-	2	4,068	100.0%	100.0%	0.0%	0.0%
		RNA	1	145	1	154	2	299	50.0%	48.5%	50.0%	51.5%
	Originating Total		**760**	**684,897**	**119**	**98,211**	**879**	**783,108**	**86.5%**	**87.5%**	**13.5%**	**12.5%**
	Terminating	InterLATA/Inter	157	189,875	71	39,380	228	229,255	68.9%	82.8%	31.1%	17.2%
		InterLATA/Intra	84	90,412	36	18,135	120	108,547	70.0%	83.3%	30.0%	16.7%
		IntraLATA/Intra	60	64,569	35	35,770	95	100,339	63.2%	64.4%	36.8%	35.6%
		IntraLATA/Inter	-	-	6	-	6	-	0.0%		100.0%	
	Terminating Total		**301**	**344,856**	**148**	**93,285**	**449**	**438,141**	**67.0%**	**78.7%**	**33.0%**	**21.3%**
Centrex 21 Total			**1,061**	**1,029,753**	**267**	**191,496**	**1,328**	**1,221,249**	**79.9%**	**84.3%**	**20.1%**	**15.7%**

			Matched		Un-Matched		Total		Matched Percent		UN Matched Percent	
Service Type	**Direction**	**Call Type**	**Calls**	**Duration**	**Calls**	**Duration**	**Calls**	**Duration**	**Calls**	**Duration**	**Calls**	**Duration**
Centrex Plus	**Originating**	DA	2	1,086	4	2,459	6	3,545	33.3%	30.6%	66.7%	69.4%
		DACC	1	972	8	7,991	9	8,963	11.1%	10.8%	88.9%	89.2%
		Inter800	2	207	1	93	3	300	66.7%	69.0%	33.3%	31.0%
		InterLATA/Inter	372	372,178	68	59,739	440	431,917	84.5%	86.2%	15.5%	13.8%
		InterLATA/Intra	146	122,168	31	21,004	177	143,172	82.5%	85.3%	17.5%	14.7%
		IntraLATA/Intra	109	99,515	54	50,588	163	150,103	66.9%	66.3%	33.1%	33.7%
		QLRN	1	1,645	-	-	1	1,645	100.0%	100.0%	0.0%	0.0%
		RNA	2	309	-	-	2	309	100.0%	100.0%	0.0%	0.0%
	Originating Total		**635**	**598,080**	**166**	**141,874**	**801**	**739,954**	**79.3%**	**80.8%**	**20.7%**	**19.2%**
	Terminating	InterLATA/Inter	150	178,283	63	28,370	213	206,653	70.4%	86.3%	29.6%	13.7%
		InterLATA/Intra	76	83,995	33	17,145	109	101,140	69.7%	83.0%	30.3%	17.0%
		IntraLATA/Intra	62	71,463	50	40,195	112	111,658	55.4%	64.0%	44.6%	36.0%
	Terminating Total		**288**	**333,741**	**146**	**85,710**	**434**	**419,451**	**66.4%**	**79.6%**	**33.6%**	**20.4%**
Centrex Plus Total			**923**	**931,821**	**312**	**227,584**	**1,235**	**1,159,405**	**74.7%**	**80.4%**	**25.3%**	**19.6%**
Grand Total			**3,397**	**3,427,432**	**964**	**636,034**	**4,361**	**4,063,466**	**77.9%**	**84.3%**	**22.1%**	**15.7%**

2. Matching Results By Call Type

Call Type	Service Type	Matched Calls	Unmatched Calls	Grand Total Calls	Matched Percent	Un Matched Percent
DA	1FB	4	7	11	36.4%	63.6%
	Centrex 21	2	6	8	25.0%	75.0%
	Centrex Plus	2	4	6	33.3%	66.7%
DA Total		8	17	25	32.0%	68.0%
DACC	1FB		9	9	0.0%	100.0%
	Centrex 21		9	9	0.0%	100.0%
	Centrex Plus	1	8	9	11.1%	88.9%
DACC Total		1	26	27	3.7%	96.3%
Inter800	1FB	4		4	100.0%	0.0%
	Centrex 21	3		3	100.0%	0.0%
	Centrex Plus	2	1	3	66.7%	33.3%
Inter800 Total		9	1	10	90.0%	10.0%
InterLATA/Inter	1FB	849	168	1017	83.5%	16.5%
	Centrex 21	601	103	704	85.4%	14.6%
	Centrex Plus	522	131	653	79.9%	20.1%
InterLATA/Inter Total		1972	402	2374	83.1%	16.9%
InterLATA/Intra	1FB	334	63	397	84.1%	15.9%
	Centrex 21	260	60	320	81.3%	18.8%
	Centrex Plus	222	64	286	77.6%	22.4%
InterLATA/Intra Total		816	187	1003	81.4%	18.6%
IntraLATA/Intra	1FB	214	138	352	60.8%	39.2%

Call Type	Service Type	Matched Calls	Unmatched Calls	Grand Total Calls	Matched Percent	Un Matched Percent
	Centrex 21	192	82	274	70.1%	29.9%
	Centrex Plus	171	104	275	62.2%	37.8%
IntraLATA/Intra Total		**577**	**324**	**901**	**64.0%**	**36.0%**
QLRN	**1FB**	**4**		**4**	100.0%	0.0%
	Centrex 21	2		2	100.0%	0.0%
	Centrex Plus	1		1	100.0%	0.0%
QLRN Total		**7**		**7**	**100.0%**	**0.0%**
RNA	**1FB**	**4**		**4**	100.0%	0.0%
	Centrex 21	1	1	2	**50.0%**	**50.0%**
	Centrex Plus	2		2		
RNA Total		**7**	**1**	**8**	87.5%	12.5%
IntraLATA/Inter	Centrex 21		6	6	0.0%	100.0%
IntraLATA/Inter Total			**6**	**6**	**0.0%**	**100.0%**
Grand Total		3397	964	4361	77.9%	22.1%

3. **Matching Results By Location:**

CLLI	Direction	Call Type	Matched Calls	Unmatched Calls	Grand Total Calls	Matched Percent	Un-Matched Percent
ARVDCOMADS0	**Originating**	DACC	1	2	3	**33.3%**	**66.7%**
		InterLATA/Inter	124	1	125	**99.2%**	**0.8%**
		InterLATA/Intra	58	-	58	**100.0%**	**0.0%**
		IntraLATA/Intra	54	10	64	**84.4%**	**15.6%**

CLLI	Direction	Call Type	Matched Calls	Unmatched Calls	Grand Total Calls	Matched Percent	Un-Matched Percent
	Originating Total		**237**	**13**	**250**	**94.8%**	**5.2%**
	Terminating	InterLATA/Inter	63	17	80	**78.8%**	**21.3%**
		InterLATA/Intra	36	14	50	**72.0%**	**28.0%**
		IntraLATA/Intra	26	19	45	**57.8%**	**42.2%**
	Terminating Total		**125**	**50**	**175**	**71.4%**	**28.6%**
ARVDCOMADS0 Total			**362**	**63**	**425**	**85.2%**	**14.8%**
BLLVWASHDS0	**Originating**	DA	2	4	6	**33.3%**	**66.7%**
		InterLATA/Inter	57	5	62	**91.9%**	**8.1%**
		InterLATA/Intra	10	-	10	**100.0%**	**0.0%**
		IntraLATA/Intra	21	1	22	**95.5%**	**4.5%**
		QLRN	2	-	2	**100.0%**	**0.0%**
		RNA	2	-	2	**100.0%**	**0.0%**
	Originating Total		**94**	**10**	**104**	**90.4%**	**9.6%**
	Terminating	InterLATA/Inter	28	5	33	**84.8%**	**15.2%**
		IntraLATA/Intra	11	9	20	**55.0%**	**45.0%**
	Terminating Total		**39**	**14**	**53**	**73.6%**	**26.4%**
BLLVWASHDS0 Total			**133**	**24**	**157**	**84.7%**	**15.3%**
BLTNMNSODS0	**Originating**	DACC	-	3	3	**0.0%**	**100.0%**
		InterLATA/Inter	125	2	127	**98.4%**	**1.6%**
		InterLATA/Intra	56	3	59	**94.9%**	**5.1%**
		IntraLATA/Intra	22	18	40	**55.0%**	**45.0%**
	Originating Total		**203**	**26**	**229**	**88.6%**	**11.4%**
	Terminating	InterLATA/Inter	59	26	85	**69.4%**	**30.6%**
		InterLATA/Intra	35	13	48	**72.9%**	**27.1%**
		IntraLATA/Intra	29	10	39	**74.4%**	**25.6%**
	Terminating Total		**123**	**49**	**172**	**71.5%**	**28.5%**
BLTNMNSODS0 Total			**326**	**75**	**401**	**81.3%**	**18.7%**

CLLI	Direction	Call Type	Matched Calls	Unmatched Calls	Grand Total Calls	Matched Percent	Un-Matched Percent
DNVRCODCDS0	Originating	DACC	-	2	2	0.0%	100.0%
		Inter800	2	-	2	100.0%	0.0%
		InterLATA/Inter	84	-	84	100.0%	0.0%
		InterLATA/Intra	38	-	38	100.0%	0.0%
		IntraLATA/Intra	25	9	34	73.5%	26.5%
	Originating Total		149	11	160	93.1%	6.9%
	Terminating	InterLATA/Inter	35	22	57	61.4%	38.6%
		InterLATA/Intra	19	9	28	67.9%	32.1%
		IntraLATA/Intra	5	12	17	29.4%	70.6%
	Terminating Total		59	43	102	57.8%	42.2%
DNVRCODCDS0 Total			208	54	262	79.4%	20.6%
DNVRCOMADS4	Originating	DACC	-	1	1	0.0%	100.0%
		Inter800	1	-	1	100.0%	0.0%
		InterLATA/Inter	49	3	52	94.2%	5.8%
		InterLATA/Intra	21	-	21	100.0%	0.0%
		IntraLATA/Intra	19	4	23	82.6%	17.4%
	Originating Total		90	8	98	91.8%	8.2%
	Terminating	InterLATA/Inter	32	15	47	68.1%	31.9%
		InterLATA/Intra	20	4	24	83.3%	16.7%
		IntraLATA/Intra	10	13	23	43.5%	56.5%
	Terminating Total		62	32	94	66.0%	34.0%
DNVRCOMADS4 Total			152	40	192	79.2%	20.8%
DNVRCOWSDS0	Originating	DACC	-	3	3	0.0%	100.0%
		Inter800	3	1	4	75.0%	25.0%
		InterLATA/Inter	107	17	124	86.3%	13.7%
		InterLATA/Intra	47	9	56	83.9%	16.1%

CLLI	Direction	Call Type	Matched Calls	Unmatched Calls	Grand Total Calls	Matched Percent	Un-Matched Percent
		IntraLATA/Intra	34	28	62	**54.8%**	**45.2%**
	Originating Total		**191**	**58**	**249**	**76.7%**	**23.3%**
	Terminating	InterLATA/Inter	48	31	79	**60.8%**	**39.2%**
		InterLATA/Intra	32	15	47	**68.1%**	**31.9%**
		IntraLATA/Intra	6	27	33	**18.2%**	**81.8%**
	Terminating Total		**86**	**73**	**159**	**54.1%**	**45.9%**
DNVRCOWSDS0 Total			**277**	**131**	**408**	**67.9%**	**32.1%**
GLVYMNORDS0	**Originating**	DACC	-	3	3	**0.0%**	**100.0%**
		InterLATA/Inter	88	23	111	**79.3%**	**20.7%**
		InterLATA/Intra	44	14	58	**75.9%**	**24.1%**
		IntraLATA/Intra	7	11	18	**38.9%**	**61.1%**
	Originating Total		**139**	**51**	**190**	**73.2%**	**26.8%**
	Terminating	InterLATA/Inter	51	24	75	**68.0%**	**32.0%**
		InterLATA/Intra	33	13	46	**71.7%**	**28.3%**
		IntraLATA/Intra	15	7	22	**68.2%**	**31.8%**
	Terminating Total		**99**	**44**	**143**	**69.2%**	**30.8%**
GLVYMNORDS0 Total			**238**	**95**	**333**	**71.5%**	**28.5%**
LKWDCOMADS0	**Originating**	DACC	-	3	3	**0.0%**	**100.0%**
		Inter800	3	-	3	**100.0%**	**0.0%**
		InterLATA/Inter	122	9	131	**93.1%**	**6.9%**
		InterLATA/Intra	51	11	62	**82.3%**	**17.7%**
		IntraLATA/Intra	38	25	63	**60.3%**	**39.7%**
	Originating Total		**214**	**48**	**262**	**81.7%**	**18.3%**
	Terminating	InterLATA/Inter	44	33	77	**57.1%**	**42.9%**
		InterLATA/Intra	23	16	39	**59.0%**	**41.0%**
		IntraLATA/Intra	17	23	40	**42.5%**	**57.5%**
	Terminating Total		**84**	**72**	**156**	**53.8%**	**46.2%**

CLLI	Direction	Call Type	Matched Calls	Unmatched Calls	Grand Total Calls	Matched Percent	Un-Matched Percent
LKWDCOMADS0 Total			**298**	**120**	**418**	**71.3%**	**28.7%**
MPLSMNDT62G	**Originating**	DACC	-	3	3	**0.0%**	**100.0%**
		InterLATA/Inter	124	13	137	**90.5%**	**9.5%**
		InterLATA/Intra	53	4	57	**93.0%**	**7.0%**
		IntraLATA/Intra	20	22	42	**47.6%**	**52.4%**
	Originating Total		**197**	**42**	**239**	**82.4%**	**17.6%**
	Terminating	InterLATA/Inter	61	29	90	**67.8%**	**32.2%**
		InterLATA/Intra	19	9	28	**67.9%**	**32.1%**
		IntraLATA/Intra	20	7	27	**74.1%**	**25.9%**
		IntraLATA/Inter	-	6	6	**0.0%**	**100.0%**
	Terminating Total		**100**	**51**	**151**	**66.2%**	**33.8%**
MPLSMNDT62G Total			**297**	**93**	**390**	**76.2%**	**23.8%**
STPLMNMIDS0	**Originating**	DACC	-	6	6	**0.0%**	**100.0%**
		InterLATA/Inter	233	25	258	**90.3%**	**9.7%**
		InterLATA/Intra	102	17	119	**85.7%**	**14.3%**
		IntraLATA/Intra	45	28	73	**61.6%**	**38.4%**
	Originating Total		**380**	**76**	**456**	**83.3%**	**16.7%**
	Terminating	InterLATA/Inter	121	42	163	**74.2%**	**25.8%**
		InterLATA/Intra	62	24	86	**72.1%**	**27.9%**
		IntraLATA/Intra	36	10	46	**78.3%**	**21.7%**
	Terminating Total		**219**	**76**	**295**	**74.2%**	**25.8%**
STPLMNMIDS0 Total			**599**	**152**	**751**	**79.8%**	**20.2%**
STTLWA06DS4	**Originating**	DA	3	6	9	**33.3%**	**66.7%**
		InterLATA/Inter	95	1	96	**99.0%**	**1.0%**
		InterLATA/Intra	18	-	18	**100.0%**	**0.0%**
		IntraLATA/Intra	38	-	38	**100.0%**	**0.0%**

CLLI	Direction	Call Type	Matched Calls	Unmatched Calls	Grand Total Calls	Matched Percent	Un-Matched Percent
		QLRN	2	-	2	100.0%	0.0%
		RNA	3	-	3	100.0%	0.0%
	Originating Total		159	7	166	95.8%	4.2%
	Terminating	InterLATA/Inter	46	7	53	86.8%	13.2%
		InterLATA/Intra	8	-	8	100.0%	0.0%
		IntraLATA/Intra	23	2	25	92.0%	8.0%
	Terminating Total		77	9	86	89.5%	10.5%
STTLWA06DS4 Total			236	16	252	93.7%	6.3%
STTLWALADS0	Originating	InterLATA/Inter	19	-	19	100.0%	0.0%
		InterLATA/Intra	3	-	3	100.0%	0.0%
		IntraLATA/Intra	12	-	12	100.0%	0.0%
	Originating Total		34	-	34	100.0%	0.0%
	Terminating	InterLATA/Inter	15	5	20	75.0%	25.0%
		InterLATA/Intra	1	-	1	100.0%	0.0%
		IntraLATA/Intra	4	8	12	33.3%	66.7%
	Terminating Total		20	13	33	60.6%	39.4%
STTLWALADS0 Total			54	13	67	80.6%	19.4%
STTLWAWEDS0	Originating	DA	1	5	6	16.7%	83.3%
		InterLATA/Inter	37	21	58	63.8%	36.2%
		InterLATA/Intra	6	9	15	40.0%	60.0%
		IntraLATA/Intra	29	7	36	80.6%	19.4%
		QLRN	1	-	1	100.0%	0.0%
		RNA	1	1	2	50.0%	50.0%
	Originating Total		75	43	118	63.6%	36.4%
	Terminating	InterLATA/Inter	32	14	46	69.6%	30.4%
		InterLATA/Intra	2	3	5	40.0%	60.0%
		IntraLATA/Intra	12	14	26	46.2%	53.8%

CLLI	Direction	Call Type	Matched Calls	Unmatched Calls	Grand Total Calls	Matched Percent	Un-Matched Percent
	Terminating Total		46	31	77	59.7%	40.3%
STTLWAWEDS0 Total			121	74	195	62.1%	37.9%
TACMWALEDS1	Originating	DA	2	2	4	50.0%	50.0%
		InterLATA/Inter	46	1	47	97.9%	2.1%
		InterLATA/Intra	17	-	17	100.0%	0.0%
		QLRN	2	-	2	100.0%	0.0%
		RNA	1	-	1	100.0%	0.0%
	Originating Total		68	3	71	95.8%	4.2%
	Terminating	InterLATA/Inter	27	11	38	71.1%	28.9%
		InterLATA/Intra	2	-	2	100.0%	0.0%
	Terminating Total		29	11	40	72.5%	27.5%
TACMWALEDS1 Total			97	14	111	87.4%	12.6%
Grand Total			3,398	964	4,362	77.9%	22.1%

4. Dial Pattern

			Matched		Unmatched		Total		Percent OF Calls		Percent Of Duration	
Dialing Pattern	**Direction**	**Call Type**	**Calls**	**Duration (tenths)**	**Calls**	**Duration (tenths)**	**Calls**	**Duration**	**Matched**	**Un-Matched**	**Matched**	**Un-Matched**
800	**Originating**	InterLATA/Inter	61	52,825	30	28,815	91	81,640	67.0%	33.0%	64.7%	35.3%
	Originating Total		**61**	**52,825**	**30**	**28,815**	**91**	**81,640**	**67.0%**	**33.0%**	**64.7%**	**35.3%**
800 Total			**61**	**52,825**	**30**	**28,815**	**91**	**81,640**	**67.0%**	**33.0%**	**64.7%**	**35.3%**
1+	**Originating**	InterLATA/Inter	405	462,777	31	30,596	436	493,373	92.9%	7.1%	93.8%	6.2%
		InterLATA/Intra	228	203,845	27	22,402	255	226,247	89.4%	10.6%	90.1%	9.9%
		IntraLATA/Intra	169	168,035	98	87,630	267	255,665	63.3%	36.7%	65.7%	34.3%
		QLRN	7	10,535	-	-	7	10,535	100.0%	0.0%	100.0%	0.0%
		RNA	7	967	1	154	8	1,121	87.5%	12.5%	86.3%	13.7%
	Originating Total		**816**	**846,159**	**157**	**140,782**	**973**	**986,941**	**83.9%**	**16.1%**	**85.7%**	**14.3%**
	Terminating	InterLATA/Inter	214	245,548	82	47,257	296	292,805	72.3%	27.7%	83.9%	16.1%
		InterLATA/Intra	191	195,185	44	20,550	235	215,735	81.3%	18.7%	90.5%	9.5%
		IntraLATA/Intra	131	140,230	85	78,488	216	218,718	60.6%	39.4%	64.1%	35.9%
		IntraLATA/Inter	-	-	3	-	3	-	0.0%	100.0%		

			Matched		Unmatched		Total		Percent OF Calls		Percent Of Duration	
Dialing Pattern	Direction	Call Type	Calls	Duration (tenths)	Calls	Duration (tenths)	Calls	Duration	Matched	Un-Matched	Matched	Un-Matched
	Terminating Total		**536**	**580,963**	**214**	**146,295**	**750**	**727,258**	**71.5%**	**28.5%**	**79.9%**	**20.1%**
1+ Total			**1,352**	**1,427,122**	**371**	**287,077**	**1,723**	**1,714,199**	**78.5%**	**21.5%**	**83.3%**	**16.7%**
1010XXX	**Originating**	Inter800	9	871	1	93	10	964	90.0%	10.0%	90.4%	9.6%
		InterLATA/Inter	257	200,987	19	17,518	276	218,505	93.1%	6.9%	92.0%	8.0%
		InterLATA/Intra	212	155,581	13	9,906	225	165,487	94.2%	5.8%	94.0%	6.0%
		IntraLATA/Intra	147	108,591	20	13,815	167	122,406	88.0%	12.0%	88.7%	11.3%
	Originating Total		**625**	**466,030**	**53**	**41,332**	**678**	**507,362**	**92.2%**	**7.8%**	**91.9%**	**8.1%**
	Terminating	InterLATA/Inter	115	146,810	49	16,120	164	162,930	70.1%	29.9%	90.1%	9.9%
		InterLATA/Intra	46	60,726	48	24,969	94	85,695	48.9%	51.1%	70.9%	29.1%
		IntraLATA/Intra	57	63,892	46	41,592	103	105,484	55.3%	44.7%	60.6%	39.4%
	Terminating Total		**218**	**271,428**	**143**	**82,681**	**361**	**354,109**	**60.4%**	**39.6%**	**76.7%**	**23.3%**
1010XXX Total			**843**	**737,458**	**196**	**124,013**	**1,039**	**861,471**	**81.1%**	**18.9%**	**85.6%**	**14.4%**
Calling Card	**Originating**	InterLATA/Inter	466	456,470	31	21,194	497	477,664	93.8%	6.2%	95.6%	4.4%
	Originating Total		**466**	**456,470**	**31**	**21,194**	**497**	**477,664**	**93.8%**	**6.2%**	**95.6%**	**4.4%**

			Matched		Unmatched		Total		Percent OF Calls		Percent Of Duration	
Dialing Pattern	**Direction**	**Call Type**	**Calls**	**Duration (tenths)**	**Calls**	**Duration (tenths)**	**Calls**	**Duration**	**Matched**	**Un-Matched**	**Matched**	**Un-Matched**
	Terminating	InterLATA/Inter	243	307,445	103	35,026	346	342,471	70.2%	29.8%	89.8%	10.2%
	Terminating Total		**243**	**307,445**	**103**	**35,026**	**346**	**342,471**	**70.2%**	**29.8%**	**89.8%**	**10.2%**
Calling Card Total			**709**	**763,915**	**134**	**56,220**	**843**	**820,135**	**84.1%**	**15.9%**	**93.1%**	**6.9%**
DA	**Originating**	DA	8	4,234	17	9,354	25	13,588	32.0%	68.0%	31.2%	68.8%
		DACC	1	972	26	26,232	27	27,204	3.7%	96.3%	3.6%	96.4%
		InterLATA/Inter	25	11,014	3	1,537	28	12,551	89.3%	10.7%	87.8%	12.2%
		InterLATA/Intra	13	5,178	15	8,175	28	13,353	46.4%	53.6%	38.8%	61.2%
		IntraLATA/Intra	2	963	24	14,307	26	15,270	7.7%	92.3%	6.3%	93.7%
	Originating Total		**49**	**22,361**	**85**	**59,605**	**134**	**81,966**	**36.6%**	**63.4%**	**27.3%**	**72.7%**
DA Total			**49**	**22,361**	**85**	**59,605**	**134**	**81,966**	**36.6%**	**63.4%**	**27.3%**	**72.7%**
Operator	**Originating**	InterLATA/Inter	96	108,922	7	8,040	103	116,962	93.2%	6.8%	93.1%	6.9%
		InterLATA/Intra	71	68,733	12	12,773	83	81,506	85.5%	14.5%	84.3%	15.7%
		IntraLATA/Intra	46	46,550	21	11,716	67	58,266	68.7%	31.3%	79.9%	20.1%
	Originating Total		**213**	**224,205**	**40**	**32,529**	**253**	**256,734**	84.2%	15.8%	87.3%	12.7%

			Matched		Unmatched		Total		Percent OF Calls		Percent Of Duration	
Dialing Pattern	**Direction**	**Call Type**	**Calls**	**Duration (tenths)**	**Calls**	**Duration (tenths)**	**Calls**	**Duration**	**Matched**	**Un-Matched**	**Matched**	**Un-Matched**
	Terminating	InterLATA/Inter	90	105,006	47	19,235	137	124,241	**65.7%**	**34.3%**	**84.5%**	**15.5%**
		InterLATA/Intra	55	64,541	28	5,942	83	70,483	66.3%	33.7%	91.6%	8.4%
		IntraLATA/Intra	26	30,608	30	22,598	56	53,206	46.4%	53.6%	57.5%	42.5%
		IntraLATA/Inter	-	-	3	-	3	-	0.0%	100.0%		
	Terminating Total		**171**	**200,155**	**108**	**47,775**	**279**	**247,930**	61.3%	38.7%	80.7%	19.3%
Operator Total			**384**	**424,360**	**148**	**80,304**	**532**	**504,664**	**72.2%**	**27.8%**	**84.1%**	**15.9%**
Grand Total			**3,398**	**3,428,041**	**964**	**636,034**	**4,362**	**4,064,075**	77.9%	22.1%	84.3%	15.7%