Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of National Exchange Carrier Association Petition to Amend Section 69.104 of the Commission's Rules	WC Docket No. 04-259 RM-10603

COMMENTS OF VERIZON[1]

I. Introduction and Summary.

The Commission should retain the rule allowing the local exchange carriers to assess up to five subscriber line charges ("SLCs") on Primary Rate Interface Integrated Service Digital Network ("PRI ISDN") service. The Commission should not, however, require the carriers to assess five SLCs on other existing T-1 derived channel services that are currently assessed up to 24 SLCs based on the number of voice communications channels. Such a change would disrupt current cost recovery and it would require an increase in the level of SLCs for all customers to make the carriers whole for the revenue loss. In addition, it would require increases in the levels of presubscribed interexchange carrier charges ("PICCs") and carrier common line charges ("CCLCs"). This would be a step backward from the Commission's recent access charge reform decisions, which have sought to reduce or eliminate PICCs and CCLCs. However, the Commission should give the price cap carriers the flexibility to apply five SLCs and line port

[1] The Verizon telephone companies ("Verizon") are the affiliated local telephone companies of Verizon Communications Inc. These companies are listed in Attachment A.

charges to new T-1 derived channel services. This would make it easier for the local exchange carriers to introduce new, innovative services that, for instance, have variable numbers of switched voice grade channels.

II. The Commission Should Retain The Rule Allowing Up To Five Subscriber Line Charges For PRI ISDN Service, But It Should Not Apply This Rule To Other Existing T-1 Derived Channel Services.

The Commission should retain its rule allowing the local exchange carriers to assess up to five SLCs for each PRI ISDN service. The current rule for PRI ISDN is an exception to the rule that SLCs must be assessed "per line," which the Commission has defined to mean "per channel" for services that are provided over multi-channel facilities, such as T-1 loops, which provide up to 24 channels.[2] The Commission adopted the rule in 1997 based on industry data showing that the average ratio of the common line loop costs of PRI ISDN service to the loop costs of basic analog voice ("POTS") service was approximately 5-to-1.[3] At the time that the Commission adopted this rule, the price cap rules allowed the carriers to recover the revenue reduction caused by the reduction in SLCs from 24 to five through their other rates in the common line basket.

However, with adoption of the *CALLS Order*,[4] a reduction in the number of SLCs that are applied to other existing T-1 derived channel services would cause a significant revenue reduction that the price cap carriers could not recover elsewhere without a waiver or modification of the rules. The *CALLS Order* defines the total revenues that a price cap carrier is

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[2] *See* 47 C.F.R. § 69.152(a); 47 C.F.R. Part 36 App. Glossary.

[3] *See Access Charge Reform*, 12 FCC Rcd 15982, ¶¶ 113-16 (1997).

[4] *See Access Charge Reform*, 15 FCC Rcd 12962, ¶ 70 (2000) ("*CALLS Order*"); 47 C.F.R. § 61.45(c).

allowed to recover through common line-related charges based on the current rule allowing application of one SLC for each channel on a T-1 based service. Accordingly, an increase in the "CMT revenue per line," which sets the limits on prices for SLCs and other rates in the CMT basket, would be needed to make up for the revenue shortfall. However, if the Commission allowed the price cap LECs to increase the CMT revenue per line, it would cause undesirable increases in other rate elements. For this reason, the Commission should maintain the *status quo* for existing T-1 derived channel services.

As is shown in Attachment B, a reduction in the number of SLCs from 24 to five for existing T-1 derived channel services without an offsetting increase in the CMT revenue per line would reduce Verizon's revenues by $9.3 million in Verizon East and by $22.6 million in the six Verizon West states that capture the majority of the demand for T-1 derived channel services other than PRI ISDN. Such a revenue loss cannot be justified under price caps, because the price cap indexes were established on the assumption that the price cap carriers would recover a SLC for each "line" on a derived channel service, and the CALLS CMT revenue per line was based on the common line revenues produced by the existing SLC rules in the 2000 annual access tariff filing.[5] It would be confiscatory and contrary to the *CALLS Order* for the Commission to require the price cap carriers to recover less revenue from SLCs than is produced by the CALLS plan without offsetting increases in other rates.

The revenue shortfall would be mitigated, but not eliminated, if the Commission allowed the local exchange carriers to establish new port charges for existing T-1 derived channel services.

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[5] *See CALLS Order*, ¶ 70; 47 C.F.R. § 61.3(d) (defining Average Price Cap CMT Revenue per Line month as Price Cap CMT revenue as of July 1, 2000, using 2000 annual filing base period demand).

Verizon estimates that the interstate port charge for these services, on average, would be only $16.65 (the interstate monthly cost of a T-1 port in excess of the cost of a POTS port), which would produce significantly less than the revenue that would be lost by changing from 24 to five SLCs. The additional port revenues would be only $1.3 million in Verizon East and $3.0 million in the six Verizon West states.[6] This would leave a shortfall of $8 million in Verizon East and $19.6 million in the six Verizon West states.

If the Commission allowed the price cap carriers to increase the CMT to offset this revenue shortfall, it would produce undesirable increases in the SLCs paid by all end users and, in some cases, it would cause increases in PICCs and CCLCs as well. As is shown in Attachment B, the SLCs would increase in the Verizon East northern states by as much as 5 cents, in effect spreading the revenue reduction for the T-1 derived channel services to all customers in the form of higher SLCs. In Verizon West, the multiline business SLC would increase in one major state by as much as $0.12. In addition, carrier access charges would increase in Verizon West. PICCs would increase by as much as $2.54, and the CCLC would be reinstated in one of the six states. Total PICC revenues would increase by $19.0 million, and new carrier common line charges would recover $1.3 million.

In the *CALLS Order*, the Commission adopted several mechanisms to reduce or eliminate PICCs and CCLCs, which the Commission found were implicit subsidies among classes of customers and which stood in the way of efficient pricing, so that customers would be able to make economically rational choices among competing providers of both local and long distance

[6] *See* Attachment B.

services.[7] Increasing PICCs and re-establishing CCLCs would be a step backwards that would undo the progress that the Commission has made in promoting a cost-based structure for access charges.

As to existing T-1 derived channel services, therefore, the Commission should avoid the necessity of raising the CMT revenue per line by continuing to allow the price cap carriers to apply 24 SLCs to these services.[8]

III. The Commission Should Allow The Carriers To Apply 5 SLCs And New Port Charges For New T-1 Derived Channel Services.

The Commission should modify its price cap rules to allow carriers to apply five SLCs and line port charges in excess of basic to new T-1 derived channel services. Applying five SLCs to new T-1 derived channel services would more closely track the relationship between the common line costs for these services and the common line costs of analog voice services, which are the basis for the SLC charge. Unlike a rule reducing the number of SLCs applicable to existing services, application of five SLCs to new T-1 derived channel services would not cause a revenue shortfall, because these would be new revenues. In addition, it would promote the introduction of new, innovative services that do not have a fixed number of voice grade channels. New T-1 derived channel services may include a mix of voice channels and data channels that may either be fixed at the time the services are ordered or may be varied by the carrier or by the customers' equipment on a real-time basis. It would be administratively difficult, as well as being inconsistent

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[7] *See CALLS Order*, ¶¶ 31, 78.

[8] There also is no need to create new line port charges for existing T-1 derived channel services. Existing T-1 derived channel services already are contributing more than their share of recovery of interstate common line costs through the application of 24 SLCs.

with the underlying loop costs, to apply different numbers of SLCs to these services based on the number of voice channels on a given service.

For instance, a service may provide for connection of a certain number of voice grade channels to the end office switch, with the remaining capacity of the T-1 loop being connected to data services, such as special access or the Internet. Under the Commission's rules, only the voice channels that were connected to the switch would be subject to the SLC.[9] However, it would be very difficult in most instances to bill different numbers of SLCs based on the number of channels that were activated. If the number of voice channels could be changed from month to month through a service order, the billing system would have to increase or decrease the total SLC charges each month. In addition, if the service allowed the customer to vary the number of voice connections on a real time basis, it would be difficult to devise a billing system that would apply the appropriate charges for each month or part of a month.

Applying a fixed number of SLCs, such as five, to new T-1 derived channel services would be more consistent with the interstate common line costs of these services, and it would reflect the fact that these costs do not vary with the number of voice channels that are activated at any given moment in time. It would make it easier for the local exchange carriers to introduce new T-1 derived channel services that do not have a fixed number of voice channels and that give the customer increased control over these services.

The Commission also should allow the price cap carriers to establish port charges for new T-1 derived channel services to recover the costs of line ports for these services in excess of the

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[9] *See* 47 C.F.R. § 69.152(a) (SLC charge is applied "for each line between the premises of an end user, or public telephone location, and a Class 5 office that is or may be used for local exchange service transmissions").

costs of basic analog voice ports. The Commission adopted a similar rule for PRI ISDN to reflect the fact that SLCs recover only the interstate cost of a line port used to provide basic, analog service.[10] Like PRI ISDN ports, the ports of other T-1 derived channel services cost significantly more than the cost of a basic, analog port. Recovery of these costs through a line port charge in excess of basic would be consistent with the Commission's policy that nontraffic sensitive common line costs, such as the costs of line ports that are dedicated to each service, should be recovered through flat-rated end user charges.[11]

IV. Impact On Universal Service Funding And Competitive ETCs.

NECA has estimated that allowing rate-of-return carriers to reduce the number of SLCs on T-1 derived channel services would increase their support from the Interstate Common Line Support ("ICLS") universal service funding mechanism by $11.5 million, assuming that the carriers also established port charges for these services.[12] To avoid such an increase, the Commission should consider allowing rate of return carriers to apply five SLCs only for new T-1 derived channel services. This would avoid an adverse impact on the universal service fund while giving these carriers flexibility with regard to new services.

The Commission should require incumbent local exchange carriers and competitive eligible telecommunications carriers ("ETCs") to receive universal service fund support on a consistent basis by requiring competitive ETCs to report the same number of "lines" that they serve for T-1 derived channel services that the incumbent local exchange carriers are required to report for the

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[10] *See Access Charge Reform*, 12 FCC Rcd 15982, ¶ 126 (1997).

[11] *See id.*, ¶ 125.

[12] *See* Joint Petition for Expedited Waiver, RM 10603, at 8 (filed Aug. 19, 2003).

same services. For example, non-rural incumbent local exchange carriers calculate their lines for the high cost fund pursuant to section 36.611(h) of the Commission's rules, which defines lines as "working Exchange Line C&WF loops used jointly for exchange and message telecommunications service."[13] For a T-1 derived channel service, which is provided over two copper loops, Verizon reports two "lines" to the universal service fund. Competitive LECs should do the same for any services they provide over T-1 facilities. This would be consistent with section 54.307 of the Commission's rules, pursuant to which competitive ETCs obtain support on the same basis as the incumbent carrier.

Conclusion

For the foregoing reasons, the Commission should allow the price cap carriers to continue applying 24 SLCs for existing T-1 derived channel services other than PRI ISDN, but it should allow them to apply five SLCs and a port charge for new T-1 derived channel services.

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[13] *See* 47 C.F.R. §§ 64.309(b)(4); 36.611(h).

ATTACHMENT A

THE VERIZON TELEPHONE COMPANIES

The Verizon telephone companies are the local exchange carriers affiliated with Verizon Communications Inc. These are:

Contel of the South, Inc. d/b/a Verizon Mid-States
GTE Southwest Incorporated d/b/a Verizon Southwest
The Micronesian Telecommunications Corporation
Verizon California Inc.
Verizon Delaware Inc.
Verizon Florida Inc.
Verizon Hawaii Inc.
Verizon Maryland Inc.
Verizon New England Inc.
Verizon New Jersey Inc.
Verizon New York Inc.
Verizon North Inc.
Verizon Northwest Inc.
Verizon Pennsylvania Inc.
Verizon South Inc.
Verizon Virginia Inc.
Verizon Washington, DC Inc.
Verizon West Coast Inc.
Verizon West Virginia Inc.

Revenue Delta: CMT Not Adjusted vs. CMT Adjusted

	Revenue Delta: CMT Not Adjusted	Revenue Delta: CMT Adjusted with Port Charge Revenue	Revenue Delta: CMT Adjusted
BNTR (Total East)			
TOTAL EUCL REVENUES (W/O SURCHARGE)	$ (9,333,918)	$ (1,277,522)	$ (6,877)
Res / SLB	$ (74,230)	$ 4,996,157	$ 5,795,759
NPR	$ (11,583)	$ 780,471	$ 905,472
BRI	$ (1,313)	$ 88,409	$ 102,565
MLB	$ (9,238,231)	$ (7,197,033)	$ (6,875,092)
PRI	$ (8,562)	$ 54,473	$ 64,420
TOTAL COMMON LINE REVENUES	$ (9,333,918)	$ (1,277,522)	$ (6,877)
BATR			
TOTAL EUCL REVENUES (W/O SURCHARGE)	$ (28,781)	$ (7,996)	$ (2,392)
Res / SLB	$ (9)	$ 12,337	$ 15,655
NPR	$ (2)	$ 2,812	$ 3,563
BRI	$ -	$ 236	$ 304
MLB	$ (26,375)	$ (21,188)	$ (19,776)
PRI	$ (2,395)	$ (2,194)	$ (2,139)
TOTAL COMMON LINE REVENUES	$ (28,781)	$ (7,996)	$ (2,392)
NXTR			
TOTAL EUCL REVENUES (W/O SURCHARGE)	$ (9,305,138)	$ (1,269,526)	$ (4,485)
Res / SLB	$ (74,220)	$ 4,983,820	$ 5,780,103
NPR	$ (11,581)	$ 777,659	$ 901,909
BRI	$ (1,313)	$ 88,173	$ 102,261
MLB	$ (9,211,856)	$ (7,175,845)	$ (6,855,317)
PRI	$ (6,167)	$ 56,667	$ 66,559
TOTAL COMMON LINE REVENUES	$ (9,305,138)	$ (1,269,526)	$ (4,485)
Port Charge Revenue Estimate			
BNTR		$ 1,270,645	
BATR		$ 5,628	
NXTR		$ 1,265,017	

Rate Delta: CMT Not Adjusted vs. CMT Adjusted

	Rate Delta: CMT Not Adjusted	Rate Delta: CMT Adjusted w/ Port Charge Revenue	Rate Delta: CMT Adjusted
VERIZON - EAST (BATR)			
SUBSCRIBER LINE CHARGE (SLC)			
DC - Residence, Single Line Business and Lifeline	$ -	$ 0.00000787	$ 0.00001518
MD - Residence, Single Line Business and Lifeline	$ (0.00000007)	$ 0.00002707	$ 0.00003563
VA - Residence, Single Line Business and Lifeline	$ (0.00000010)	$ 0.00003285	$ 0.00004101
WV - Residence, Single Line Business and Lifeline	$ -	$ -	$ -
DE - Residence, Single Line Business and Lifeline	$ (0.00000146)	$ 0.00019212	$ 0.00024138
NJ - Residence, Single Line Business and Lifeline	$ -	$ 0.00011134	$ 0.00014027
PA - Residence, Single Line Business and Lifeline	$ -	$ 0.00017436	$ 0.00022157
DC Non-Primary Residence and BRI ISDN	$ -	$ 0.00000787	$ 0.00001518
MD Non-Primary Residence and BRI ISDN	$ (0.00000007)	$ 0.00002707	$ 0.00003563
VA Non-Primary Residence and BRI ISDN	$ (0.00000010)	$ 0.00003285	$ 0.00004101
WV Non-Primary Residence and BRI ISDN	$ -	$ -	$ -
DE Non-Primary Residence and BRI ISDN	$ (0.00000146)	$ 0.00019212	$ 0.00024138
NJ Non-Primary Residence and BRI ISDN	$ -	$ 0.00011134	$ 0.00014027
PA Non-Primary Residence and BRI ISDN	$ -	$ 0.00017436	$ 0.00022157
DC - Multi-Line Business and Centrex	$ -	$ 0.00000787	$ 0.00001518
MD - Multi-Line Business and Centrex	$ (0.00000007)	$ 0.00002707	$ 0.00003563
VA - Multi-Line Business and Centrex	$ (0.00000010)	$ 0.00003285	$ 0.00004101
WV - Multi-Line Business and Centrex	$ -	$ (0.00000271)	$ (0.00000090)
DE - Multi-Line Business and Centrex	$ (0.00000146)	$ 0.00019212	$ 0.00024138
NJ - Multi-Line Business and Centrex	$ -	$ 0.00011134	$ 0.00014027
PA - Multi-Line Business and Centrex	$ -	$ 0.00017436	$ 0.00022157
DC - Multi-Line Business - ISDN PRI	$ 0.01035816	$ 0.01039751	$ 0.01043406
MD - Multi-Line Business - ISDN PRI	$ (0.01321594)	$ (0.01308024)	$ (0.01303746)
VA - Multi-Line Business - ISDN PRI	$ 0.01000300	$ 0.01016776	$ 0.01020858
WV - Multi-Line Business - ISDN PRI	$ 0.00282361	$ 0.00281005	$ 0.00281911
DE -Multi-Line Business - ISDN PRI	$ 0.00221053	$ 0.00317843	$ 0.00342472
NJ - Multi-Line Business - ISDN PRI	$ (0.00733763)	$ (0.00678095)	$ (0.00663630)
PA - Multi-Line Business - ISDN PRI	$ (0.01896269)	$ (0.01809091)	$ (0.01785483)
VERIZON - EAST (NXTR)			
SUBSCRIBER LINE CHARGE (SLC)			
*PRIMARY RESIDENCE, SL BUSINESS, LIFELINE - ME,MA,NH,RI,VT,NY	$ (0.00071741)	$ 0.04817320	$ 0.05587002
NON PRIMARY RESIDENCE AND BRI ISDN - ME,MA,NH,RI,VT,NY	$ (0.00071741)	$ 0.04817320	$ 0.05587002
ML BUSN AND CENTREX - ME,MA,NH,RI,VT,NY	$ (0.00071741)	$ 0.04817320	$ 0.05587002
PRI ISDN SERVICE - ME,MA,NH,RI,VT,NY	$ (0.02399205)	$ 0.22046101	$ 0.25894508

Revenue Delta: CMT Not Adjusted vs. CMT Adjusted

		Revenue Delta: CMT Not Adjusted	Revenue Delta: CMT Adjusted with Port Charges Revenue	Revenue Delta: CMT Adjusted
TOTAL	CCL REVENUES	$ -	$ 1,335,799	$ 1,660,859
	EUCL REVENUES	$ (24,393,951)	$ (22,931,723)	$ (22,653,267)
	Res / SLB	$ -	$ -	$ -
	NPR	$ -	$ -	$ -
	BRI	$ -	$ -	$ -
	MLB	$ (24,393,951)	$ (22,949,701)	$ (22,675,207)
	PRI	$ -	$ 17,978	$ 21,940
	PICC REVENUES	$ 1,818,268	$ 18,971,315	$ 21,395,749
	MLB	$ 774,142	$ 15,283,318	$ 17,329,902
	PRI	$ 200,951	$ 731,484	$ 802,579
	Centrex	$ 843,175	$ 2,956,513	$ 3,263,268
	TOTAL COMMON LINE REVENUES	$ (22,575,682)	$ (2,624,609)	$ 403,341
GTCA	CCL REVENUES	$ -	$ -	$ -
	EUCL REVENUES	$ (6,492,278)	$ (5,107,406)	$ (4,887,072)
	Res / SLB	$ -	$ -	$ -
	NPR	$ -	$ -	$ -
	BRI	$ -	$ -	$ -
	MLB	$ (6,492,278)	$ (5,123,525)	$ (4,905,756)
	PRI	$ -	$ 16,119	$ 18,684
	PICC REVENUES	$ 8,102	$ 4,224,368	$ 4,895,173
	MLB	$ (463,724)	$ 2,709,003	$ 3,213,784
	PRI	$ 44,901	$ 144,209	$ 160,009
	Centrex	$ 426,925	$ 1,371,157	$ 1,521,381
	TOTAL COMMON LINE REVENUES	$ (6,484,176)	$ (883,038)	$ 8,101
GTFL	CCL REVENUES	$ -	$ -	$ -
	EUCL REVENUES	$ (5,603,935)	$ (5,603,935)	$ (5,603,935)
	Res / SLB	$ -	$ -	$ -
	NPR	$ -	$ -	$ -
	BRI	$ -	$ -	$ -
	MLB	$ (5,603,935)	$ (5,603,935)	$ (5,603,935)
	PRI	$ -	$ -	$ -
	PICC REVENUES	$ 424,395	$ 5,007,189	$ 5,670,292
	MLB	$ 203,819	$ 4,120,723	$ 4,687,476
	PRI	$ 62,932	$ 252,914	$ 280,403
	Centrex	$ 157,644	$ 633,552	$ 702,413
	TOTAL COMMON LINE REVENUES	$ (5,179,540)	$ (596,746)	$ 66,357
GAIL	CCL REVENUES	$ -	$ -	$ -
	EUCL REVENUES	$ (2,835,486)	$ (2,835,486)	$ (2,835,486)
	Res / SLB	$ -	$ -	$ -
	NPR	$ -	$ -	$ -
	BRI	$ -	$ -	$ -
	MLB	$ (2,835,486)	$ (2,835,486)	$ (2,835,486)
	PRI	$ -	$ -	$ -
	PICC REVENUES	$ 202,086	$ 2,463,109	$ 2,835,487
	MLB	$ 177,203	$ 2,345,649	$ 2,702,780
	PRI	$ 5,876	$ 27,736	$ 31,337
	Centrex	$ 19,007	$ 89,723	$ 101,370
	TOTAL COMMON LINE REVENUES	$ (2,633,401)	$ (372,377)	$ -

Revenue Delta: CMT Not Adjusted vs. CMT Adjusted

		Revenue Delta: CMT Not Adjusted	Revenue Delta: CMT Adjusted with Port Charges Revenue	Revenue Delta: CMT Adjusted
GAMI	CCL REVENUES	$ -	$ -	$ -
	EUCL REVENUES	$ (2,119,616)	$ (2,119,616)	$ (2,119,616)
	Res / SLB	$ -	$ -	$ -
	NPR	$ -	$ -	$ -
	BRI	$ -	$ -	$ -
	MLB	$ (2,119,616)	$ (2,119,616)	$ (2,119,616)
	PRI	$ -	$ -	$ -
	PICC REVENUES	$ 486,854	$ 1,846,622	$ 2,119,616
	MLB	$ 429,930	$ 1,651,349	$ 1,896,567
	PRI	$ 9,221	$ 31,632	$ 36,131
	Centrex	$ 47,703	$ 163,641	$ 186,918
	TOTAL COMMON LINE REVENUES	$ (1,632,762)	$ (272,993)	$ -
GTOH	CCL REVENUES	$ -	$ 1,335,799	$ 1,660,859
	EUCL REVENUES	$ (3,062,235)	$ (2,984,879)	$ (2,926,756)
	Res / SLB	$ -	$ -	$ -
	NPR	$ -	$ -	$ -
	BRI	$ -	$ -	$ -
	MLB	$ (3,062,235)	$ (2,986,738)	$ (2,930,012)
	PRI	$ -	$ 1,859	$ 3,256
	PICC REVENUES	$ 75,758	$ 1,265,897	$ 1,265,897
	MLB	$ (28,165)	$ 1,035,114	$ 1,035,114
	PRI	$ 32,874	$ 73,003	$ 73,003
	Centrex	$ 71,049	$ 157,780	$ 157,780
	TOTAL COMMON LINE REVENUES	$ (2,986,477)	$ (383,183)	$ -
GTTX	CCL REVENUES	$ -	$ -	$ -
	EUCL REVENUES	$ (4,280,401)	$ (4,280,401)	$ (4,280,401)
	Res / SLB	$ -	$ -	$ -
	NPR	$ -	$ -	$ -
	BRI	$ -	$ -	$ -
	MLB	$ (4,280,401)	$ (4,280,401)	$ (4,280,401)
	PRI	$ -	$ -	$ -
	PICC REVENUES	$ 621,074	$ 4,164,130	$ 4,609,285
	MLB	$ 455,078	$ 3,421,479	$ 3,794,182
	PRI	$ 45,149	$ 201,990	$ 221,696
	Centrex	$ 120,847	$ 540,660	$ 593,407
	TOTAL COMMON LINE REVENUES	$ (3,659,327)	$ (116,271)	$ 328,884
	PORT CHARGE REVENUE ESTIMATE			
	GTCA		$ 891,141	
	GTFL		$ 663,103	
	GAIL		$ 372,377	
	GAMI		$ 272,993	
	GTOH		$ 383,183	
	GTTX		$ 445,154	

Rate Delta: CMT Not Adjusted vs. CMT Adjusted

		Rate Delta: CMT Not Adjusted	Rate Delta: CMT Adjusted w/ Port Chg Revenue	Rate Delta: CMT Adjusted
GTCA	**EUCL Rates**			
	Primary Res, Single Line Bus, Lifeline EU(	$0.000000	$0.000000	$0.000000
	NonPrimary Residence & BRI ISDN EUCL	$0.000000	$0.000000	$0.000000
	Multiline Bus, PRI ISDN, Centrex EUCL	$0.000000	$0.121664	$0.141021
	Multiline Business & PRI ISDN PICC	$0.335559	$1.077713	$1.195789
	Carrier Common Line			
	Terminating CCL Prem.	$0.000000	$0.000000	$0.000000
	Terminating CCL Non-Prem.	$0.000000	$0.000000	$0.000000
	Originating CCL Prem.	$0.000000	$0.000000	$0.000000
	Originating CCL Non-Prem.	$0.000000	$0.000000	$0.000000
GTFL	**EUCL Rates**			
	Primary Res, Single Line Bus, Lifeline EU(	$0.000000	$0.000000	$0.000000
	NonPrimary Residence & BRI ISDN EUCL	$0.000000	$0.000000	$0.000000
	Multiline Bus, PRI ISDN, Centrex EUCL	$0.000000	$0.000000	$0.000000
	Multiline Business & PRI ISDN PICC	$0.551089	$2.214755	$2.455477
	Carrier Common Line			
	Terminating CCL Prem.	$0.000000	$0.000000	$0.000000
	Terminating CCL Non-Prem.	$0.000000	$0.000000	$0.000000
	Originating CCL Prem.	$0.000000	$0.000000	$0.000000
	Originating CCL Non-Prem.	$0.000000	$0.000000	$0.000000
GAIL	**EUCL Rates**			
	Primary Res, Single Line Bus, Lifeline EU(	$0.000000	$0.000000	$0.000000
	NonPrimary Residence & BRI ISDN EUCL	$0.000000	$0.000000	$0.000000
	Multiline Bus, PRI ISDN, Centrex EUCL	$0.000000	$0.000000	$0.000000
	Multiline Business & PRI ISDN PICC	$0.538063	$2.539969	$2.869671
	Carrier Common Line			
	Terminating CCL Prem.	$0.000000	$0.000000	$0.000000
	Terminating CCL Non-Prem.	$0.000000	$0.000000	$0.000000
	Originating CCL Prem.	$0.000000	$0.000000	$0.000000
	Originating CCL Non-Prem.	$0.000000	$0.000000	$0.000000

Rate Delta: CMT Not Adjusted vs. CMT Adjusted

		Rate Delta: CMT Not Adjusted	Rate Delta: CMT Adjusted w/ Port Chg Revenue	Rate Delta: CMT Adjusted
GAMI	**EUCL Rates**			
	Primary Res, Single Line Bus, Lifeline EU(	$0.000000	$0.000000	$0.000000
	NonPrimary Residence & BRI ISDN EUCL	$0.000000	$0.000000	$0.000000
	Multiline Bus, PRI ISDN, Centrex EUCL	$0.000000	$0.000000	$0.000000
	Multiline Business & PRI ISDN PICC	$0.611472	$2.097612	$2.395977
	Carrier Common Line			
	Terminating CCL Prem.	$0.000000	$0.000000	$0.000000
	Terminating CCL Non-Prem.	$0.000000	$0.000000	$0.000000
	Originating CCL Prem.	$0.000000	$0.000000	$0.000000
	Originating CCL Non-Prem.	$0.000000	$0.000000	$0.000000
GTOH	**EUCL Rates**			
	Primary Res, Single Line Bus, Lifeline EU(	$0.000000	$0.000000	$0.000000
	NonPrimary Residence & BRI ISDN EUCL	$0.000000	$0.000000	$0.000000
	Multiline Bus, PRI ISDN, Centrex EUCL	$0.000000	$0.049362	$0.086451
	Multiline Business & PRI ISDN PICC	$0.857868	$1.905076	$1.905076
	Carrier Common Line			
	Terminating CCL Prem.	$0.000000	$0.000000	$0.000000
	Terminating CCL Non-Prem.	$0.000000	$0.000000	$0.000000
	Originating CCL Prem.	$0.000000	$0.002853	$0.003548
	Originating CCL Non-Prem.	$0.000000	$0.001284	$0.001597
GTTX	**EUCL Rates**			
	Primary Res, Single Line Bus, Lifeline EU(	$0.000000	$0.000000	$0.000000
	NonPrimary Residence & BRI ISDN EUCL	$0.000000	$0.000000	$0.000000
	Multiline Bus, PRI ISDN, Centrex EUCL	$0.000000	$0.000000	$0.000000
	Multiline Business & PRI ISDN PICC	$0.415502	$1.858922	$2.040275
	Carrier Common Line			
	Terminating CCL Prem.	$0.000000	$0.000000	$0.000000
	Terminating CCL Non-Prem.	$0.000000	$0.000000	$0.000000
	Originating CCL Prem.	$0.000000	$0.000000	$0.000000
	Originating CCL Non-Prem.	$0.000000	$0.000000	$0.000000