

FCC Form 525
 High Cost Support Mechanism
 Competitive Carrier Line Count Report

FCC Form 525
 OMB Control No. 3060-0986
 January 2005

COMPETITIVE CARRIERS HIGH COST DATA SUBMISSION

(1) Quarterly Submission Date: 12/30/04

(2) USAC Service Provider Identification Number (SPIN): 143000449

(3) Company Study Area Code: (First time filers leave blank and a Study Area Code will be assigned) 639001

(4) Study Area Name: Centennial Puerto Rico Operations Corp.

(5) Company Legal Name: Centennial Puerto Rico Operations Corp.

(6) Filer 499 ID:

Check Box if this is a new address/contact from a previous data submission:

(7) Mailing Address: 3349 Route 138, Bldg. A, Wall, NJ 07719

(8) Contact Name: Karen Groschel (9) Title: Administrator-Regulatory Affairs

(10) Telephone Number: 732-556-2200 (x3262)

(11) E-mail Address: kgroschel@centennialcorp.com

Do Not Write in this Area:
 For Administrator's Use Only

(12) Mechanism for which you are requesting support:	(13) Lines Reported as of:	(14) Type of Filing		(15) Worksheet to Complete
		Original	Revision	
High Cost Loop Support (HCL)				Complete HCL and LSS
Local Switching Support (LSS)				Complete HCL and LSS
Interstate Common Line Support (ICLS)	6/30/2004	x		Complete ICLS Worksheet
High Cost Model Support (HCM)				Complete HCM Worksheet
Interstate Access Support (IAS)				Complete IAS Worksheet

INTERSTATE COMMON LINE SUPPORT (ICLS) LINE COUNT WORKSHEET

(2) USAC Service Provider Identification Number (SPIN):	143000449		Do Not Write in this Area: For Administrator's Use Only
(3) Company Study Area Code:	639001		
(4) Study Area Name:	Centennial Puerto Rico Operations Corp.		
(13) Lines Reported as of:	6/30/2004		
(14) Type of Filing:			

Line Count Data for Path 1, 2 & 3 Carriers

Complete one row for each disaggregation zone.

(24) Incumbent Carrier Name	(25) Incumbent Carrier SAC	(26) ETC Designation	(27) Path Designation	(28) Disaggregation Zone Name	(29) Wire Center GULF Code	(30) Residence & Single Line Business	(31) Multi-Line Business	(32) Total Number of Lines in Service
Puerto Rico Tel. Co.	633201	Yes	1	Not applicable	Not applicable	283,135	48,423	331,558
PRTC-Central	633200	Yes	2	Culebra (culbprxa)	CULBPRXA	51	0	51
PRTC-Central	633200	Yes	2	Vieques (vquesprxa)	VQUSPRXA	495	2	497
PRTC-Central	633200	Yes	2	AguasBuenas (asbsprxa)	ASBSPRXA	1,691	26	1,717
PRTC-Central	633200	Yes	2	Cidra (cdraprxa)	CDRAPRXA	3,142	79	3,221
PRTC-Central	633200	Yes	2	San Lorenzo (snizprxa)	SNLZPRXA	2,469	27	2,496
PRTC-Central	633200	Yes	2	Las Piedras (lspoprxa)	LSPDPRXA	3,096	109	3,205
PRTC-Central	633200	Yes	2	Gurabo (gurbprxa)	GURBPRXA	3,853	140	3,993
PRTC-Central	633200	Yes	2	Juncos (juncprsz)	JUNCPRXA	3,247	76	3,323
PRTC-Central	633200	Yes	2	Cavey (cavyprxa)	FJRDPRXA	4,123	88	4,211
PRTC-Central	633200	Yes	2	Alonito (abjprxa)	ABITPRXA	1,641	38	1,679
PRTC-Central	633200	Yes	2	Caguas (cagusprxb)	CGUSPRXB	17,837	4,125	21,962
PRTC-Central	633200	Yes	2	Guaynabo (guynprxa)	GUYNPRXA	12,252	514	12,766
						337,032	53,647	390,679

Use an additional sheet if necessary.

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TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING FCC FORM 525 ON ITS OWN BEHALF:

Certification of Officer or Employee as to the Accuracy of the Data Reported in FCC Form 525, Line Count Report for Competitive Carriers, on Behalf of Reporting Carrier			
I certify that I am an officer or employee of the reporting carrier; my responsibilities include ensuring the accuracy of the actual line count data reported on FCC Form 525; and, to the best of my knowledge, the information reported on this form is accurate.			
Name of Reporting Carrier: Centennial Puerto Rico Operations Corp.			
Service Provider Identification Number: 143000449			
Signature of authorized officer or employee:			Date:
Printed name of authorized officer or employee: William L. Roughton, Jr.			
Title or position of authorized officer or employee: VP Legal & Regulatory Affairs			
Telephone number of authorized officer or employee: (732) 556 - 2261 ext.			
Study Area Code of Reporting CETC	639001	Filing Due Date for this form	12/30/2004
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.			

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COMPETITIVE CARRIERS HIGH COST DATA SUBMISSION

(1) Quarterly Submission Date:

(2) USAC Service Provider Identification Number (SPIN):

(3) Company Study Area Code: (First time filers leave blank and a Study Area Code will be assigned)

(4) Study Area Name:

(5) Company Legal Name:

(6) Filer 498 ID:

Check Box if this is a new address/contact from a previous data submission:

(7) Mailing Address:

(8) Contact Name: (9) Title:

(10) Telephone Number:

(11) E-mail Address:

Do Not Write in this Area:
For Administrator's Use Only

(12) Mechanism for which you are requesting support:	(13) Lines Reported as of:	(14) Type of Filing:		(15) Worksheet to Complete
		Original	Revision	
High Cost Loop Support (HCL)				Complete HCL and LSS
Local Switching Support (LSS)				Complete HCL and LSS
Interstate Common Line Support (ICLS)	9/30/2004	x		Complete ICLS Worksheet
High Cost Model Support (HCM)				Complete HCM Worksheet
Interstate Access Support (IAS)				Complete IAS Worksheet

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 High Cost Mechanism
 Competitive Carrier Line Count Report

FCC Form 525
 OMB Control No. 3060-0986
 January 2005

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING FCC FORM 525 ON ITS OWN BEHALF:

Certification of Officer or Employee as to the Accuracy of the Data Reported in FCC Form 525, Line Count Report for Competitive Carriers, on Behalf of Reporting Carrier			
<p>I certify that I am an officer or employee of the reporting carrier; my responsibilities include ensuring the accuracy of the actual line count data reported on FCC Form 525; and, to the best of my knowledge, the information reported on this form is accurate.</p>			
Name of Reporting Carrier: Centennial Puerto Rico Operations Corp.			
Service Provider Identification Number: 143000449			
Signature of authorized officer or employee:			Date:
Printed name of authorized officer or employee: William L. Roughton, Jr.			
Title or position of authorized officer or employee: VP Legal & Regulatory Affairs			
Telephone number of authorized officer or employee: (732) 556 - 2261 ext.			
Study Area Code of Reporting CETC	639001	Filing Due Date for this form	3/30/05
<small>Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.</small>			

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Competitive Carrier Line Count Report

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OMB Control No. 3060-0986
January 2005

COMPETITIVE CARRIERS HIGH COST DATA SUBMISSION

(1) Quarterly Submission Date:	7/30/05
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(2) USAC Service Provider Identification Number (SPIN):	143000449
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(3) Company Study Area Code: (First-time filers leave blank and a Study Area Code will be assigned)	639001
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(4) Study Area Name:	Centennial Puerto Rico Operations Corp.
(5) Company Legal Name:	Centennial Puerto Rico Operations Corp.
(6) Filer 499 ID:	

Check Box if this is a new address/contact from a previous data submission:

(7) Mailing Address:	3349 Route 138, Bldg. A, Wall, NJ 07719		
(8) Contact Name:	Karen Groschel	(9) Title:	Administrator-Regulatory Affairs
(10) Telephone Number:	732-556-2200 (x3262)		
(11) E-mail Address:	kgroschel@centennialcorp.com		

Do Not Write in this Area:
For Administrator's Use Only

(12) Mechanism for which you are requesting support:	(13) Lines Reported as of:	(14) Type of Filing:		(15) Worksheet to Complete:
		Original	Revision	
High Cost Loop Support (HCL)				Complete HCL and LSS
Local Switching Support (LSS)				Complete HCL and LSS
Interstate Common Line Support (ICLS)	12/30/2004	x		Complete ICLS Worksheet
High Cost Model Support (HCM)				Complete HCM Worksheet
Interstate Access Support (IAS)				Complete IAS Worksheet

FCC Form 525
High Cost Support Mechanism
Competitive Carrier Line Count Report

FCC Form 525
OMB Control No. 3060-0988
January 2005

INTERSTATE COMMON LINE SUPPORT (ICLS) LINE COUNT WORKSHEET

(2) USAC Service Provider Identification Number (SPIN):	143000449		Do Not Write in this Area: For Administrator's Use Only
(3) Company Study Area Code:	639001		
(4) Study Area Name:	Centennial Puerto Rico Operations Corp.		
(13) Lines Reported as of:	12/30/2004		
(14) Type of Filing:			

Line Count Data for Path 1, 2 & 3 Carriers
Complete one row for each disaggregation zone.

(24) Incumbent Carrier Name	(25) Incumbent Carrier SAC	(26) ETC Designation	(27) Path Designation	(28) Disaggregation Zone Name	(29) Wire Center CLLI Code	(30) Residence & Single Line Business	(31) Multi-line Business	(32) Total Number of Lines in Service
Puerto Rico Tel. Co.	633201	Yes	1	Not applicable	Not applicable	302,973	38,146	341,119
PRTC-Central	633200	Yes	2	Culebra (culbprxa)	CULBPRXA	75	0	75
PRTC-Central	633200	Yes	2	Vieques (vquesprxa)	VQUSPRXA	776	4	780
PRTC-Central	633200	Yes	2	AguasBuenas (asbsprxa)	ASBSPRXA	2,107	7	2,114
PRTC-Central	633200	Yes	2	Cidra (cdraprxa)	CDRAPRXA	3,490	12	3,502
PRTC-Central	633200	Yes	2	San Lorenzo (snizprxa)	SNLZPRXA	2,737	9	2,746
PRTC-Central	633200	Yes	2	Las Piedras (lspoprxa)	LSPDPRXA	3,586	85	3,671
PRTC-Central	633200	Yes	2	Gurabo (gurbprxa)	GURBPRXA	4,278	83	4,361
PRTC-Central	633200	Yes	2	Juncos (juncprsz)	JUNCPRXA	3,623	25	3,648
PRTC-Central	633200	Yes	2	Cayey (cayyprxa)	FJRDPRXA	4,541	29	4,570
PRTC-Central	633200	Yes	2	Aibonito (abiprxa)	ABITPRXA	1,841	31	1,872
PRTC-Central	633200	Yes	2	Caguas (cgusprxb)	CGUSPRXB	19,504	3,390	22,894
PRTC-Central	633200	Yes	2	Guaynabo (guynprxa)	GUYNPRXA	13,711	205	13,916
						363,442	42,026	405,468

Use an additional sheet if necessary.

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 January 2005

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING FCC FORM 525 ON ITS OWN BEHALF:

Certification of Officer or Employee as to the Accuracy of the Data Reported in FCC Form 525, Line Count Report for Competitive Carriers, on Behalf of Reporting Carrier			
<p>I certify that I am an officer or employee of the reporting carrier; my responsibilities include ensuring the accuracy of the actual line count data reported on FCC Form 525; and, to the best of my knowledge, the information reported on this form is accurate.</p>			
Name of Reporting Carrier: Centennial Puerto Rico Operations Corp.			
Service Provider Identification Number: 143000449			
Signature of authorized officer or employee:			Date:
Printed name of authorized officer or employee: William L. Roughton, Jr.			
Title or position of authorized officer or employee: VP Legal & Regulatory Affairs			
Telephone number of authorized officer or employee: (732) 558 - 2261 ext.			
Study Area Code of Reporting CETC	639001	Filing Due Date for this form	07/30/2005
<small>Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.</small>			

**Attachment 6: Spreadsheet Deriving Actual
Centennial ICLS Receipts for 2004**

Cash Received (From Centennial Financial Records)

Payment By Program (From USAC Quarterly Publications)

Description a	effective date b	applies to the month of c	SPIN d	ACH or Check No. or Bank Reference e	Amount Received f	g	Long Term Monthly Support h	Interstate CL Monthly Support i	Total High Cost Monthly col. h + Col. i j	Column f	USAC
										minus Column j k	published true-up of 2002 l
ACH Credit	40227	Jan-04	143000449	3751256605	1,064,470.00	Appendix HC01 1Q2004	\$1,075,007	\$8,266	\$1,083,273	(\$18,803)	
ACH Credit	40331	Feb-04	143000449	3751256605	1,064,470.00	Appendix HC01 1Q2004	\$1,075,007	\$8,266	\$1,083,273	(\$18,803)	
ACH Credit	40430	Mar-04	143000449	3751256605	1,064,470.00	Appendix HC01 1Q2004	\$1,075,007	\$8,266	\$1,083,273	(\$18,803)	
ACH Credit	40528	Apr-04	143000449		1,288,537.00	Appendix HC01 2Q2004	\$1,279,775	\$8,763	\$1,288,538	(\$1)	
Check	40629	May-04	143000449	3440082987	1,288,537.00	Appendix HC01 2Q2004	\$1,279,775	\$8,763	\$1,288,538	(\$1)	
Check	40728	Jun-04	143000449	340086010	1,242,099.00	Appendix HC01 2Q2004	\$1,279,775	\$8,763	\$1,288,538	(\$45,439)	
						Appendix HC09 3Q2004					
Check	40827	Jul-04	143000449	340089584	1,602,407.00	Appendix HC01 3Q2004	\$0	\$1,628,151	\$1,628,151	(\$25,744)	(\$25,744)
						Appendix HC09 3Q2004					
Check	40928	Aug-04	143000449	340093167	1,602,407.00	Appendix HC01 3Q2004	\$0	\$1,628,151	\$1,628,151	(\$25,744)	(\$25,744)
Bank of America Previous day detail report	41029	Sep-04	143000449	255199047	1,602,407.00	Appendix HC09 3Q2004	\$0	\$1,628,151	\$1,628,151	(\$25,744)	(\$25,744)
Bank of America Previous day detail report	41130	Oct-04	143000449	257664244	1,688,622.00	Appendix HC21 1Q2005		\$1,714,366	\$1,714,366	(\$25,744)	(\$25,744)
Bank of America Previous day detail report	41230	Nov-04	143000449	257379473	1,688,622.00	Appendix HC21 1Q2005		\$1,714,366	\$1,714,366	(\$25,744)	(\$25,744)
Bank of America Previous day detail report	50131	Dec-04	143000449	251598792	1,688,622.00	Appendix HC21 1Q2005		\$1,714,366	\$1,714,366	(\$25,744)	(\$25,744)
					<u>16,885,670.00</u>	Total:	<u>\$7,064,346</u>	<u>\$10,078,638</u>	<u>\$17,142,984</u>	<u>(\$257,314)</u>	<u>(\$154,464)</u>

EXHIBIT 3



Davis Wright Tremaine LLP

ANCHORAGE BELLEVUE LOS ANGELES NEW YORK PORTLAND SAN FRANCISCO SEATTLE SHANGHAI WASHINGTON, D.C.

CHRISTOPHER SAVAGE
DIRECT (202) 828-9811
chrissavage@dwt.com

SUITE 200
1919 PENNSYLVANIA AVE NW
WASHINGTON, DC 20006

TEL (202) 659-9750
FAX (202) 452-0067
www.dwt.com

March 13, 2007

VIA E-MAIL AND HAND DELIVERY

Ms. Karen M. Majcher
Vice President, High Cost and Low Income Division
Universal Service Administrative Company
2000 L Street N.W., Suite 200
Washington, D.C. 20036

Re: Appeal Under 47 C.F.R. § 54.719(a) of True-Up Of 2004 ICLS for Centennial Communications Corp. in Puerto Rico

Dear Ms. Majcher:

This letter is being filed on behalf of Centennial Communications Corp. (Centennial).¹ It supplements the appeal noted above, which Centennial filed by means of a letter to you dated September 25, 2006. We incorporate that letter by reference here.

Briefly, this appeal arises from USAC's action, in August 2006, to begin offsetting Centennial's current payments under the Interstate Common Line Support ("ICLS") program, based on USAC's true-up calculations for Puerto Rico for calendar year 2004. One of the key problems with USAC's true-up calculations was the erroneous treatment of first-half 2004 Long-Term Support ("LTS") payments to the Puerto Rico Telephone Company ("PRTC"). Specifically, as we explained, USAC treated these first-half revenues as an annual amount, and, in effect, spread them over the entire year. We explained that treating these LTS revenues as relevant to an ILCS true-up violates the specific ruling of the Federal Communications Commission ("FCC") that LTS "shall not be provided to any carrier beginning July 1, 2004," citing *Multi-Association Group (MAG) Plan for Regulation of Interstate Services of Non-Price Cap Incumbent Local Exchange Carriers*, Report and Order and Second Further Notice of Proposed Rulemaking, 19 FCC Rcd 4122 (2004) ("*LTS Order*") at ¶ 67.

¹ The specific Centennial entity receiving support relevant to this appeal is Centennial Puerto Rico Operations Corp.

Ms. Karen M. Majcher
March 13, 2007
Page 2

We specifically explained that, because the FCC has legally confined LTS revenue to the 1st half of 2004, it is a mistake – a misapplication of the FCC’s rules – to spread 1st-half-2004 LTS revenue into the 2nd half of that year.

An FCC order issued earlier today confirms that Centennial’s understanding of the FCC’s rules is correct. Puerto Rico regulators had asked the FCC for clarification of the application of 47 C.F.R. §54.311 versus § 54.315 in light of the transition from LTS to ICLS in 2004. In disposing of that matter, the Wireline Competition Bureau stated:

Effective July 1, 2004, the Commission consolidated LTS into Interstate Common Line Support (ICLS) and eliminated LTS as a distinct mechanism.^[fn 2]

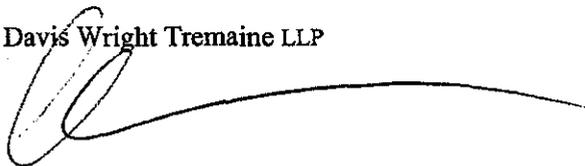
Federal-State Joint Board on Universal Service Telecommunications Regulatory Board of Puerto Rico Petition for Clarification, or in the Alternative, Waiver of Section 54.311(b) of the Commission’s Rules, Order, CC Docket No. 96-45, DA 07-1235 (rel. March 13, 2007) at ¶ 2 (emphasis added, footnote omitted). The omitted footnote – footnote 2 – cites to the very same portions of the LTS Order on which Centennial relied in its appeal letter.² A copy of this order is attached for your convenience.

This order shows that the FCC itself has made clear that Centennial’s understanding of the elimination of LTS as of July 1, 2004 is the correct one. It follows that USAC’s true-up calculation, which mathematically attributes substantial amounts of LTS revenue prior to that date to the second half of calendar year 2004, is a misapplication of the FCC’s true-up rules.³

We respectfully request that USAC take account of this recent FCC statement and grant Centennial’s pending appeal in this matter.

Very truly yours,

Davis Wright Tremaine LLP



Christopher Savage

² That footnote states in full: “See *Multi-Association Group (MAG) Plan for Regulation of Interstate Services of Non-Price Cap Incumbent Local Exchange Carriers and Interexchange Carriers*, CC Docket No. 00-256, Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Report and Order and Second Further Notice of Proposed Rulemaking, 19 FCC Rcd 4122, 4150-53 paras. 61-67 (2004).”

³ We describe the nature of USAC’s specific errors in the true-up calculation in our September 25 letter at pages 3-6.

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
)	
Federal-State Joint Board on Universal Service)	
)	CC Docket No. 96-45
Telecommunications Regulatory Board of Puerto Rico)	
)	
Petition for Clarification, or in the Alternative, Waiver of Section 54.311(b) of the Commission's Rules)	

ORDER

Adopted: March 12, 2007

Released: March 12, 2007

By the Acting Deputy Chief, Wireline Competition Bureau:

1. In this Order, we dismiss as moot the request of the Telecommunications Regulatory Board of Puerto Rico (Puerto Rico Board) for clarification or, in the alternative, waiver of section 54.311(b) of the Commission's rules.

2. On December 8, 2003, the Puerto Rico Board requested that the Commission clarify that section 54.311(b), the cascading or targeting rule, does not apply to the Long Term Support (LTS) portion of interim hold-harmless funds received by Puerto Rico Telephone Company, Inc. (PRTC).¹ In the alternative, the Puerto Rico Board requests that the Commission waive the rule. Effective July 1, 2004, the Commission consolidated LTS into Interstate Common Line Support (ICLS) and eliminated LTS as a distinct mechanism.² ICLS is not subject to the cascading or targeting provisions of section 54.311(b), but rather is subject to the disaggregation and targeting provisions of section 54.315.³ Although PRTC had the opportunity to disaggregate its ICLS in 2002, it chose not to do so.⁴ Accordingly, the Puerto Rico Board's request for clarification or, in the alternative, waiver is moot.

3. Accordingly, IT IS ORDERED, pursuant to the authority contained in sections 1, 4(i), 4(j), and 254 of the Communications Act of 1934, as amended, 47 U.S.C. §§ 151, 154(i), 154(j), and 254, and pursuant to delegated authority under sections 0.91, 0.291, and 1.3 of the Commission's rules, 47

¹ Telecommunications Regulatory Board of Puerto Rico, Petition for Clarification, or in the Alternative, Waiver of Section 54.311(b), CC Docket No. 96-45 (filed Dec. 8, 2003).

² See *Multi-Association Group (MAG) Plan for Regulation of Interstate Services of Non-Price Cap Incumbent Local Exchange Carriers and Interexchange Carriers*, CC Docket No. 00-256, *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order and Second Further Notice of Proposed Rulemaking, 19 FCC Rcd 4122, 4150-53 paras. 61-67 (2004).

³ See 47 C.F.R. §§ 54.311(b), 54.315(b).

⁴ See 47 C.F.R. § 54.315(a)-(b).

C.F.R. § 0.91, 0.291, and 1.3, that this ORDER IS ADOPTED.

4. IT IS FURTHER ORDERED, pursuant to the authority contained in sections 1, 4(i), 4(j), and 254 of the Communications Act of 1934, as amended, 47 U.S.C. §§ 151, 154(i), 154(j), and 254, and pursuant to delegated authority under sections 0.91, 0.291, and 1.3 of the Commission's rules, 47 C.F.R. § 0.91, 0.291, and 1.3, that the Petition for Clarification, or in the Alternative, Waiver of Section 54.311(b), filed by of the Telecommunications Regulatory Board of Puerto Rico on December 8, 2003, IS DISMISSED.

5. IT IS FURTHER ORDERED that, pursuant to authority delegated under sections 0.91, 0.291 and 1.102 of the Commission's rules, 47 C.F.R. §§ 0.91, 0.291, 1.102, this Order SHALL BE EFFECTIVE upon release.

FEDERAL COMMUNICATIONS COMMISSION

Renee R. Crittenden
Acting Deputy Chief
Wireline Competition Bureau