DIRECT TESTIMONY

OF

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POLICY DEPARTMENT

TELECOMMUNICATIONS DIVISION

ILLINOIS COMMERCE COMMISSION

IN THE MATTER OF THE CELLULAR PROPERTIES, INC., APPLICATION FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER FOR PURPOSES OF RECEIVING FEDERAL UNIVERSAL SERVICE SUPPORT PURSUANT TO SECTION 214(e)(2) OF THE TELECOMMUNICATIONS ACT OF 1996, 47 U.S.C. § 214(e)(2)

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Q. Please state your name and business address.

A. My name is James Zolnierek and my business address is 527 East Capitol Avenue, Springfield, Illinois 62701.

Q. By whom are you employed and in what capacity?

A. I am employed by the Illinois Commerce Commission ("Commission" or "ICC") as the Interim Manager of Policy Department within the Public Utility Bureau's Telecommunications Division.

Q. Please state your education background and previous job responsibilities.

A. I earned my Doctor of Philosophy degree in economics from Michigan State University in 1996. Prior to joining the Illinois Commerce Commission I was employed by the Federal Communications Commission ("FCC") in the Common Carrier Bureau, Industry Analysis Division.

Overview

Q. What is the purpose of your testimony?

A. In this proceeding Cellular Properties, Inc. ("Cellular Properties") seeks Eligible Telecommunications Carrier ("ETC") status in certain areas within Illinois. The purpose of my testimony is to evaluate creamskimming, local

usage, and low income program issues that relate to Cellular Properties eligibility for ETC status.

Creamskimming

Evaluation Guidelines/Criteria

Q. In what areas does the potential for creamskimming factor into ETC eligibility?

A. In this proceeding Cellular Properties seeks redefinition of the service areas of six rural local exchange carriers, including "Citizens Telecommunications of Illinois d/b/a Frontier Communications of Illinois ("Citizens"), Illinois Consolidated Telephone Company ("ICTC"), Montrose Mutual Telephone Company ("Montrose"), Odin Telephone Exchange, Inc. ("Odin"), Verizon South, Inc. ("Verizon South"), and Wabash Telephone Cooperative ("Wabash").[1] With respect to such rural redefinition requests the Federal Communications Commission ("FCC") has indicated that:

> As part of the public interest analysis for ETC applicants that seek designation below the service area level of a rural incumbent LEC, we will perform an examination to detect the potential for creamskimming effects that is similar to the analysis employed in the *Virginia Cellular ETC Designation Order* and the *Highland Cellular ETC Designation Order*. As discussed below, the state commissions that apply a creamskimming analysis similar to the Commission's will facilitate the Commission's review of petitions seeking

[1] Cellular Properties, Inc. Applications for Designation as an Eligible Telecommunications Carrier for Purposes of Receiving Federal Universal Service Support Pursuant to Section 214(e)(2) of the Telecommunications Act of 1996, 47 U.S.C. §214(e)(2) ("Petition") ¶¶ 23-29.

> redefinition of incumbent LEC service areas filed pursuant to section 214(e)(5) of the Act.[2]

Following the FCC's direction, here I provide an analysis of the potential for creamskimming effects raised by Cellular Properties' request for service area redefinitions in rural service areas.

Although Cellular Properties also proposes redefinitions of certain non-rural local exchange carrier service areas,[3] I do not provide an analysis of the potential for creamskimming effects raised by Cellular Properties' request for service area redefinitions in the non-rural service areas. With respect to such non-rural redefinition requests the FCC has stated:

> We find that a creamskimming analysis is unnecessary for ETC applicants seeking designation below the service area level of non-rural incumbent LECs. Unlike the rural mechanism, which uses embedded costs to distribute support on a service area-wide basis, the non-rural mechanism uses a forward-looking cost model to distribute support to individual wire centers where costs exceed the national average by a certain amount. Therefore, under the non-rural methodology, high-density, low-cost wire centers receive little or no high-cost support, thereby protecting against the potential for creamskimming.[4]

Thus, according to the FCC, the potential for creamskimming is not an issue with respect Cellular Properties' eligibility for ETC status in the service area of non-rural incumbent LECs.

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[2] Federal Communications Commission, Report and Order ("ETC Order"), CC Docket No. 96-45, FCC 05-46, Released March 17, 2005, at ¶ 48 (footnotes omitted).
[3] Petition at ¶ 20.
[4] FCC, ETC Order, at ¶ 52 (footnotes omitted).

Q. What circumstances has the FCC identified as creating the potential for creamskimming?

A. The FCC has stated that "[t]he potential for creamskimming … arises when an ETC seeks designation in a disproportionate share of high-density wire centers in an incumbent LEC's service area."[5]

Q. Why has the FCC identified creamskimming as a public interest concern?

A. The FCC has identified to two primary concerns with respect to creamskimming. First the FCC stated:

> By serving a disproportionate share of the high-density portion of a service area, an ETC may receive more support than is reflective of the rural incumbent LEC's costs of serving that wire center because support for each line is based on the rural telephone company's average costs for serving the entire service area unless the incumbent LEC has disaggregated its support.[6]

Second, the FCC stated:

> The effects of creamskimming also would unfairly affect the incumbent LEC's ability to provide service throughout the area since it would be obligated to serve the remaining high-cost wire centers in the rural service area while ETCs could target the rural incumbent LEC's customers in the lowest cost areas and also receive support for serving the customers in these areas.[7]

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[5] Id. at ¶ 49.
[6] Id.
[7] Id.

Q. Do the FCC guidelines for analyzing creamskimming require an assessment of whether a carrier seeking ETC designation intends to creamskim or not?

A. No. The FCC has stated that "…the analysis should consider not whether the competitive ETC intends to creamskim, but whether the ETC applicant's proposed service area has the effect of creamskimming."[8]

Staff Information

Q. Did you compile any information with respect to wire-center density in the rural service areas where Cellular Properties is seeking redesignation?

A. Yes. For each of the six rural service areas, I computed population per square mile information for each wire center contained within the rural service area. These figures are presented in Exhibit JZ-1 to my testimony. I obtained wire center boundary information from Wire Center Premium v 7.3.[9] I obtained population and area information from the 2000 Census of Population and Housing ("2000 Census of Population").[10]

Q. How did you calculate population per square mile and household per square mile information?

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[8] Id. at ¶ 49, n. 136.

[9] Wire Center Premium v 7.3 is dated October 2003 and is produced by Geographic Data Technology.

[10] The 2000 Census of Population and Housing is produced by the U.S. Department of Commerce, U.S. Census Bureau.

A. I mapped each census block reported in the 2000 Census of Population into a unique Illinois wire center based upon the internal point latitude and longitude for each census block contained in the 2000 Census of Population. Then, for each wire center, I summed the population and land area figures from the 2000 Census of Population for each census block that I mapped into each wire center. This methodology provides an estimate of the density of each wire center that I use as an independent verification of the density information supplied by Cellular Properties.

Analysis

Citizens Service Area

Q. Does the information you collected provide any reason to believe that the potential for creamskimming exists with respect to Cellular Properties' proposal to serve only a portion of the Citizens Service Area?

A. No. The information I compiled suggests that the average population density of the portion of the Citizens service area Cellular Properties proposes to include as part of its designated ETC area is below the average population density of the portion of the Citizens service area Cellular Properties does not propose to include as part of its designated

ETC area and below the average population density of the entire Citizens service area.[11]

ICTC Service Area

Q. Does the information you collected provide any reason to believe that the potential for creamskimming exists with respect to Cellular Properties' proposal to serve only a portion of the ICTC Service Area?

A. No. The Commission has determined that slight disparities in density do not give rise to significant cream-skimming concerns.[12] The average population density of the portion of the ICTC service area Cellular Properties proposes to include as part of its designated ETC area is slightly greater than the average population density of the portion of the ICTC service area Cellular Properties does not propose to service (the ratio of the two population densities is 1.08:1) and slightly greater than the average populations density of the entire ICTC service area (the ratio of the two population densities is 1.06:1). In both cases the disparities are less than 5 persons per square mile. Therefore, I recommend the Commission accept Cellular Properties' proposed ETC service area definitions in the ICTC service area.

[11] The averages computed here (and hereafter) across wire centers are derived by dividing the entire population of the census blocks with center points in the wire centers by the total land area of the census blocks with center points in wire centers.
[12] Amendatory Interim Order in Docket No. 04-0653 at 29.

Montrose Service Area

Q. Does the information you collected provide any reason to believe that the potential for creamskimming exists with respect to Cellular Properties' proposal to serve only a portion of the Montrose Service Area?

A. No. The information I compiled suggests that the average population density of the portion of the Montrose service area Cellular Properties proposes to include as part of its designated ETC area is below the average population density of the portion of the Montrose service area Cellular Properties does not propose to include as part of its designated ETC area and below the average population density of the entire Montrose service area.

Odin Service Area

Q. Does the information you collected provide any reason to believe that the potential for creamskimming exists with respect to Cellular Properties' proposal to serve only a portion of the Odin Service Area?

A. No. The information I compiled suggests that the average population density of the portion of the Odin service area Cellular Properties proposes to include as part of its designated ETC area is below the

average population density of the portion of the Odin service area Cellular Properties does not propose to include as part of its designated ETC area and below the average population density of the entire Odin service area.

Verizon South Service Area

Q. Does the information you collected provide any reason to believe that the potential for creamskimming exists with respect to Cellular Properties' proposal to serve only a portion of the Verizon South Service Area?

A. No. The information I compiled suggests that the average population density of the portion of the Verizon South service area Cellular Properties proposes to include as part of its designated ETC area is below the average population density of the portion of the Verizon South service area Cellular Properties does not propose to include as part of its designated ETC area and below the average population density of the entire Verizon South service area.

Wabash Service Area

Q. Does the information you collected provide any reason to believe that the potential for creamskimming exists with respect to Cellular

Properties' proposal to serve only a portion of the Wabash Service Area?

A. No. As I stated above, the Commission has determined that slight disparities in density do not give rise to significant cream-skimming concerns. The average population density of the portion of the Wabash service area Cellular Properties proposes to include as part of its designated ETC area is slightly greater than the average population density of the portion of the Wabash service area Cellular Properties does not propose to service (the ratio of the two population densities is 1.11:1) and slightly greater than the average populations density of the entire Wabash service area (the ratio of the two population densities is 1.03:1). In both cases the disparities are less than 2 persons per square mile. Therefore, I recommend the Commission accept Cellular Properties' proposed ETC service area definitions in the Wabash service area.

Recommendation

Q. Please summarize your recommendation with respect to the potential for creamskimming raised by Cellular Properties petition.

A. Based on the evidence supplied by Cellular Properties and the evidence I have independently gathered and presented above, I recommend that the Commission find that the potential for creamskimming effects does not arise with respect to the Cellular Properties' proposed ETC area.

Local Usage

Evaluation Guidelines/Criteria

Q. What local usage criteria has the FCC applied when it determines ETC eligibility?

A. The FCC has imposed a requirement on each ETC applicant that requires it to "demonstrate that it offers a local usage plan comparable to that offered by the incumbent LEC in the service areas for which the applicant seeks designation."[13]

Q. What reason did the FCC cite for applying a local usage criterion that examines the comparability of an ETC applicant's local usage plan(s) to the plan(s) offered by the incumbent local exchange carriers?

A. The FCC stated that such a criterion can be used to determine "whether the ETC applicant provides adequate local usage to receive designation as an ETC."[14] This local usage requirement is consistent with the FCC's concern that ensuring affordable access to supported services is not sufficient, but rather that both access and some minimum level of usage must be provided. That is, as stated by the FCC, "…in order for consumers in rural, insular, and high cost areas to realize the full benefits

[13] Id. at ¶ 32.
[14] FCC, ETC Order, at ¶ 34 (footnotes omitted).

of affordable voice grade access, usage of, and not merely access to, the local network should be supported.[15]

Q. Did the FCC impose specific guidelines for evaluating the comparability of an ETC applicant's local usage plan(s) to the plan(s) offered by the incumbent local exchange carriers serving the proposed ETC areas?

A. No. The FCC specifically indicated that local rate comparability should be evaluated on a "case-by-case basis."[16]

Q. Has the Commission provided guidance on this issue in previous ETC proceedings?

A. Yes. The Commission has determined "[a] proper comparison would place the various and diverse features of each local usage plan side-by-side in printed form, enabling a consumer to assess at little more than a glance how one plan or another better suits that consumer's needs."[17] In fact, the Commission determined that "[a]s a prerequisite to ETC designation, Petitioner is required to develop local usage rate plan comparisons to the plans offered by the Incumbent Local Exchange

[15] Federal Communications Commission, Report and Order ("USF First Report and Order"), CC Docket No. 96-45, FCC 97-157, Released May 8, 1997, at ¶ 65 (footnote omitted).
[16] Id. at ¶ 33.
[17] Amendatory Interim Order in Docket No. 04-0653 at 15.

Carrier ("ILEC") in the service areas for which the Petitioner seeks ETC designation."[18]

Analysis

Q. Has Cellular Properties presented local usage rate plan comparisons, which compare its plans to those offered by ILECs in the service areas for which the Petitioner seeks ETC designation, in this proceeding?

A. No. Cellular Properties has not presented the rate plans offered by ILECs or presented a comparison placing the various and diverse features of its (either current or proposed) usage plans and those of the ILECs side-by-side.

Q. Has Cellular Properties presented any evidence other than a side-by-side comparison of its rates and those of ILECs that would indicate whether or not it provides adequate local usage to receive designation as an ETC?

A. Yes. In particular, Cellular Properties has committed to offer a plan it labels "an ILEC Equivalent Plan" that includes unlimited local calling for a flat rate of $20.39 per month.[19]

[18] Id.
[19] Petition at ¶ 53.

Q. What is the significance of the $20.39 rate for Cellular Properties ILEC Equivalent Plan?

A. 220 ILCS 5/13-301(d) requires the Commission, when establishing a state universal service fund, to:

> Establish an affordable price for the supported telecommunications services for the respective incumbent local exchange carrier. The affordable price shall be no less than the rates in effect at the time the Commission creates a fund pursuant to this item. The Commission may establish and utilize indices or models for updating the affordable price for supported telecommunications services.[20]

In establishing the current state universal service fund the Commission established an affordable rate of $20.39.[21] The services supported by the current state universal service fund include all of the services currently supported by the federal universal service fund.[22] Thus, the Commission has established $20.39 as an affordable price for the services that Cellular Properties is required to provide as an ETC and for which it will receive federal universal service support.

Q. In your opinion, should the Commission accept Cellular Properties commitment to provide an affordably rated, unlimited local usage plan as a substitute for a side-by-side comparison of plans offered

[20] 220 ILCS 5/13-301(e)(4).
[21] Second Interim Order on Rehearing in Docket Nos. 00-0233/00-0335 (consolidated), Dated March 13, 2002, at 5-6.
[22] Second Interim Order in Docket Nos. 00-0233/00-0335 (consolidated), Dated September 18, 2001, at 5.

by ILECs as evidence that it provides adequate local usage to receive designation as an ETC?

A. No, the proposal is inadequate in its current form. While the Cellular Properties proposal could prove to be a plan that ensures that Cellular Properties provides adequate local usage to receive designation as an ETC, the plan requires further explanation before it meets that objective. In particular, Cellular Properties must provide evidence that it will not bundle local and toll service inextricably together in a manner that would prohibit customers from reasonably obtaining the local usage component of its proposed ILEC Equivalent rate plan.

Q. Can and should the Commission consider Cellular Properties' proposal if Cellular Properties has not provided a side-by-side comparison of its rates and those of ILECs in the areas where it seeks ETC status?

A. The Commission is not required to follow the FCC ETC guidelines provided its decisions are consistent with federal and other state law and if it makes designations that are consistent with the public interest, convenience, and necessity.[23] Thus, the Commission can consider Cellular Properties evidence.

Furthermore, the Commission should consider Cellular Properties evidence. The FCC's local usage comparability test is but a means to an

[23] FCC, ETC Order, at ¶ 61.

end. It is intended, as noted above, to provide assurance that an ETC applicant provides adequate local usage to receive designation as an ETC. Cellular Properties has pledged to offer a local service package of supported services that allows callers unlimited local calling at a rate the Commission has designated affordable. Thus, Cellular Properties has pledged to provide an offering that includes adequate local usage to receive designation as an ETC. Such an offering might obviate the need for a side-by-side comparison of Cellular Properties' rate(s) and the prevailing ILECs' rate(s).

Preparation of side-by-side comparisons of the rates that it will offer and those of the ILECs provides one means for Cellular Properties to demonstrate that it will provide adequate local usage to receive designation as an ETC. Cellular Properties has, however, gone far toward such a demonstration through alternative means; that is, it has committed to offer a local service package of supported services that allows callers unlimited local calling at a rate the Commission has already determined to be affordable. Cellular Properties offering of unlimited local calling would necessarily compare favorably to any incumbent carrier when evaluating the minutes of use allowed under each carrier's plan. Therefore, requiring a side-by-side comparison as proof that Cellular Properties provides affordable and adequate local usage to receive designation as an ETC could impose on Cellular Properties a redundant and, therefore,

unnecessary requirement. Thus, I recommend the Commission consider Cellular Properties commitment to provide an affordably rated, unlimited local usage plan as a substitute for a side-by-side comparison of plans offered by Cellular Properties and ILECs.

Q. What further information must Cellular Properties supply in order to prove that is proposed ILEC Equivalent Plan is a plan that proves it provides local usage adequate for it to receive designation as an ETC?

A. Cellular Properties must explain toll calling arrangements for customers of its proposed ILEC Equivalent Plan. If Cellular Properties offers to allow customers of the ILEC Equivalent Plan to select the toll carrier or carriers of its choice for all toll calling and does not impose any additional charges on its customers (apart from those described in its proposal), then I would recommend the Commission find that by offering its ILEC Equivalent Plan Cellular Properties provides adequate local usage to receive designation as an ETC.

If, however, Cellular Properties does not propose to offer equal access at no additional charge to its customers, then, absent the details of its proposed toll arrangement and the ability to analyze those details, I cannot recommend the Commission find that by offering its ILEC Equivalent Plan

Cellular Properties provides adequate local usage to receive designation as an ETC.

Q. Why does Cellular Properties' provisioning of toll arrangements within its proposed ILEC Equivalent Plan affect your ability to determine whether Cellular Properties provides adequate local usage to receive designation as an ETC?

A. If Cellular Properties bundles local and toll service inextricably together, then it could conceivably offer toll service at prohibitive rates. By assessing prohibitive and unavoidable toll charges, Cellular Properties could effectively prevent consumers from reasonably accessing the local usage plan in its ILEC Equivalent Plan. Under such circumstances, Cellular Properties would not provide adequate local usage to receive designation as an ETC. Absent information to show that such a circumstance does not exist, I cannot recommend the Commission find that by offering its ILEC Equivalent Plan Cellular Properties provides adequate local usage to receive designation as an ETC.

Recommendation

Q. Please summarize your recommendation regarding whether Cellular Properties has supplied adequate evidence and/or made sufficient

commitments that it will provide adequate local usage to receive designation as an ETC.

A. If Cellular Properties offers to allow customers of the ILEC Equivalent Plan to select the toll carrier or carriers of its choice for all toll calling and does not impose any additional charges on its customers (apart from those described in its proposal), then I would recommend the Commission find that by offering its ILEC Equivalent Plan Cellular Properties provides adequate local usage to receive designation as an ETC. If, however, Cellular Properties does not propose to offer equal access at no additional charge to its customers, then, absent the details of its proposed toll arrangement and the ability to analyze those details, I cannot recommend the Commission find that by offering its ILEC Equivalent Plan, Cellular Properties provides adequate local usage to receive designation as an ETC.

Low Income Programs

Evaluation Guidelines/Criteria

Q. What obligation does an ETC have with regard to low income support programs?

A. FCC rules obligate an ETC to provide the low income support programs known as Lifeline and Link-Up and advertise the availability of those

services in a manner reasonably designed to reach those likely to qualify for them.[24]

Analysis

Q. Has Cellular Properties presented evidence that it will offer low income programs to customers in its proposed ETC areas?

A. Yes. Cellular Properties has committed to waiving activation fees for Link-Up eligible customers.[25] In addition, Cellular Properties has committed to offering Lifeline eligible customers a plan that is priced at $1.75 below its ILEC Equivalent Plan and that waives the subscriber line charge associated with the ILEC Equivalent Plan.[26]

Q. If Cellular Properties fulfills its proposed commitments with respect to Lifeline and Link-Up will it be offering low income programs adequate for ETC designation?

A. This question turns again on how Cellular Properties proposes to provide toll arrangements for its Lifeline plan. If Cellular Properties offers to allow customers of the ILEC Equivalent Plan to select the toll carrier or carriers of its choice for all toll calling and does not impose any additional charges on its customers (apart from those described in its proposal), then I would recommend, provided Cellular Properties makes the further commitment

[24] 47 C.F.R. §§ 54.405 and 54.411.
[25] Petition at ¶ 54.
[26] Id.

to use low income support only to subsidize low income customer rates as explained below, the Commission find that by offering its Lifeline and Link-Up plans Cellular Properties provides adequate low income programs to receive designation as an ETC. If, however, Cellular Properties does not propose to offer equal access at no additional charge to its customers, then, absent the details of its proposed toll arrangement and the ability to analyze those details, I cannot recommend the Commission find that by offering its proposed Lifeline and Link-Up plans Cellular Properties will provide adequate low income programs to receive designation as an ETC.

Q. Are there any other commitments that the Commission should require Cellular Properties to make to ensure that it provides low income programs adequate for it to receive ETC designation?

A. Yes. The Commission should require Cellular Properties to commit to and certify that all low income Universal Service Funding ("USF") funding it receives will be used to support subsidized rates for its Lifeline and Link-Up customers. This is the same requirement the Commission has imposed on other ETC designees and ensures that low income support funds are used solely for their intended purposes.[27]

Q. Does Cellular Properties propose to advertise its low income programs?

[27] Order in Docket No. 06-0038 at 15.

A. Yes. Cellular Properties proposes to advertise its low income programs to qualifying customers and, in particular, to advertise in locations where qualified, unserved consumers are likely to find such information useful.[28]

Q. If Cellular Properties fulfills its proposed commitments with respect to advertising of Lifeline and Link-Up will it meet its ETC advertising requirements?

A. Cellular Properties commitment will go far toward meeting advertising requirements adequate for ETC designation. However, to ensure the adequacy of such advertising, the Commission should require, as it has in past proceedings, that Cellular Properties additionally commit to advertising its services in compliance with the requirements of 83 Illinois Administrative Code Part 757. If honored, this commitment will ensure that Cellular Properties advertises its low income programs in compliance with rules the Commission has established for such advertising.

Recommendation

Q. Please summarize your recommendation regarding whether Cellular Properties has supplied adequate evidence and/or made sufficient commitments that it will provide low income programs.

A. If Cellular Properties offers to allow customers of the ILEC Equivalent Plan to select the toll carrier or carriers of its choice for all toll calling and does

[28] Id. at ¶ 55.

not impose any additional charges on its customers (apart from those described in its proposal), then I would recommend the Commission find that by offering its Lifeline and Link-Up plans Cellular Properties provides adequate low income programs to receive designation as an ETC. If, however, Cellular Properties does not propose to offer equal access at no additional charge to its customers, then, absent the details of its proposed toll arrangement and the ability to analyze those details, I cannot recommend the Commission find that by offering its proposed Lifeline and Link-Up plans Cellular Properties will provide adequate low income programs to receive designation as an ETC. The Commission should also, prior to designating Cellular Properties as an ETC, require Cellular Properties to commit to and certify that all low income USF funding it receives will be used to support subsidized rates for its Lifeline and Link-Up customers.

I also recommend that the Commission find that if Cellular Properties fulfills its proposed commitments with respect to advertising of Lifeline and Link-Up and additionally commits and fulfills the commitment to advertise its low income services in compliance with the requirements of 83 Illinois Administrative Code Part 757, then it will meet its ETC low income program advertising requirements.

Q. Does this conclude your testimony?

A. Yes.

Creamskimming Analysis for the Citizens Telecom Co Illinois Area

OCNAME	DOMSWITCH	WIRE CENTER	POP	Land Area (Sqr. Miles)	Population per Square Mile
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	ABNGILXDRS0	ABINGDON	4,866	96.50	50.42
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	ADVLILXERS0	ADDIEVILLE	564	29.08	19.40
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	ALBYILXDRS0	ALBANY	2,358	65.53	35.98
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	ALEDILXDDS0	ALEDO	5,069	107.74	47.05
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	ALXSILXDRS0	ALEXIS	1,645	87.73	18.75
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	ALPHILXDRS0	ALPHA	1,123	28.52	39.38
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	ALMTILXEDS0	ALTAMOUNT	3,937	76.30	51.60
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	ANDVILXDRS0	ANDOVER	1,565	50.96	30.71
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	ASHYILXERS0	ASHLEY	1,715	63.02	27.21
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	BTLSILXERS0	BARTELSCO	1,186	26.56	44.65
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	BASCILXCRS0	BASCO	1,224	118.34	10.34
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	BTTWILXERS0	BATCHTOWN	837	43.05	19.44
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	BATHILXDDS0	BATH	1,019	86.42	11.79
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	BCCYILXERS0	BEECHER CITY	1,361	54.23	25.10
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	BNLDILXCRS0	BENLD	3,110	15.48	200.96
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	BGVLILXDRS1	BIGGSVILLE	1,110	50.34	22.05
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	BOWNILXCRS0	BOWEN	789	54.71	14.42
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	BRTWILXERS0	BROWNSTOWN	1,494	42.58	35.08
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	BRSLILXERS0	BRUSSELS	1,131	50.77	22.28
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	BNHLILXERS0	BUNKER HILL	3,164	31.28	101.14
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	CRVLILXCDS0	CARLINVILLE	8,753	165.25	52.97
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	CRTHILXCDS0	CARTHAGE	3,347	72.17	46.37
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	CHWKILXARS0	CHADWICK	1,069	55.87	19.13
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	CHFDILXERS0	HESTERFIELD-ROCKBRIDG	1,132	90.56	12.50
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	COFNILXCRS0	COFFEEN	1,393	44.27	31.47
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	COLTILXARS0	COLETA	748	31.29	23.91
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	CRDVILXDRS0	CORDOVA	1,151	31.07	37.05
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	DLCYILXCRS0	DALLAS CITY	1,447	19.73	73.34
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	DNSNILXCRS0	DONNELLSON	1,208	49.98	24.17
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	DOW ILXERS0	DOW	1,966	25.08	78.38
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	DUBSILXERS0	DUBOIS	779	53.52	14.56
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	EDBQILXSDS0	E. DUBUQUE	4,882	36.66	133.17
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	HMPNILXDDS0	EAST MOLINE (HAMPTON)	3,152	14.52	217.06
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	ELIZILXDRS0	ELIZA	1,010	96.19	10.50
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	ELTNILXCRS0	ELVANSTON	362	37.89	9.55
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	ERIEILXDRS0	ERIE	2,856	86.10	33.17
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	FRRSILXCRS0	FERRIS	655	57.56	11.38
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	FLDNILXERS0	FIELDON	1,127	64.67	17.43
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	FLMRILXCRS0	FILLMORE	1,041	63.41	16.42
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	FLTNILXADS0	FULTON	4,654	19.48	238.87
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	GLLSILXCRS0	GILLESPIE	4,607	45.20	101.93
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	GNVWILXCRS0	GREENVIEW	1,622	77.29	20.99
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	GLPTILXDRS0	GULFPORT	746	30.89	24.15

Creamskimming Analysis for the Citizens Telecom Co Illinois Area

CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	HBGCILXERS0	HAMBURG	661	41.58	15.90
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	HMTNILXCDS0	HAMILTON	3,789	60.85	62.27
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	HRDNILXERS0	HARDIN	1,687	57.10	29.55
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	HTTCILXERS0	HETTICK	471	29.21	16.12
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	HLDLILXDRS0	HILLSDALE	1,496	49.05	30.50
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	HFMNILXERS0	HOFFMAN	832	25.16	33.07
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	HPPLILXERS1	HOOPPOLE	485	44.97	10.78
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	HYTNILXEDS0	HOYLETON	1,360	86.34	15.75
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	INA ILXERS0	INA	3,219	31.78	101.30
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	IVTNILXERS0	IRVINGTON	1,301	20.01	65.01
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	JRVLILXEDS0	JERSEYVILLE	10,820	120.74	89.61
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	JOY ILXDRS0	JOY	822	57.97	14.18
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	KMVLILAARS0	KAMPSVILLE	585	29.58	19.78
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	KTBGILXDRS0	KEITHSBURG	980	38.21	25.65
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	KYPTILXERS0	KEYESPORT	1,299	37.19	34.93
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	KLBRILXDRS0	KILBOURNE	617	46.76	13.20
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	KRWDILXDRS0	KIRKWOOD	1,310	67.25	19.48
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	LNRKILXADS0	LANARK	3,110	101.26	30.71
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	LTYRILXDRS0	LITTLE YORK	764	69.10	11.06
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	LNMLILXDRS0	LONDON MILLS	817	40.71	20.07
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	LYNDILXADS0	LYNDON	1,270	39.63	32.05
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	MSCYILXCDS0	MASON CITY	3,170	90.27	35.12
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	MTVLILXDRS0	MATHERVILLE	1,244	19.20	64.78
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	MEDRILXERS0	MEDORA	1,882	74.39	25.30
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	MDVLILXADS0	MILLEDGEVILLE	1,989	69.16	28.76
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	MNMOILXDDS0	MONMOUTH	11,771	114.98	102.37
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	MRSNILXADS0	MORRISON	7,651	137.05	55.83
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	MTOLILXCDS0	MOUNT OLIVE	3,640	48.95	74.37
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	MLGVILXERS0	MULBERRY GROVE	2,004	72.59	27.61
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	NAUVILXCRS0	NAUVOO	1,689	54.87	30.78
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	NBTNILXDRS0	NEW BOSTON	1,148	47.75	24.04
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	NWDGILXCRS0	NEW DOUGLAS	911	39.72	22.93
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	NWMDILXERS0	NEW MINDON	404	25.73	15.70
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	NIOTILXCRS0	NIOTA	373	16.75	22.27
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	NHNDILXDRS0	NORTH HENDERSON	412	32.67	12.61
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	OQWKILXDRS0	OQUAWKA	2,335	23.75	98.32
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	PATKILXERS0	PATOKA	2,084	115.81	18.00
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	PSBGILXERS0	PITTSBURG	704	53.39	13.19
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	POLOILXADS0	POLO	3,884	93.60	41.50
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	PTBYILXDDS0	PORT BYRON	3,962	36.71	107.92
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	PRMPILXDRS0	PREEMPTION	554	15.33	36.14
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	PPTWILXADS0	PROPHETSTOWN	2,858	66.35	43.08
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	RMSYILXEDS0	RAMSEY	2,588	135.40	19.11
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	RIO ILXDRS0	RIO	463	25.25	18.33
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	RSVLILXDRS1	ROSEVILLE	1,538	70.90	21.69

Creamskimming Analysis for the Citizens Telecom Co Illinois Area

CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	SNDVILXEDS0	SANDOVAL	1,875	18.75	100.01
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	SETNILXDRS0	SEATON	503	47.26	10.64
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	SHNNILXARS0	SHANNON	1,588	64.51	24.62
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	SHTCILXERS0	SHATTUC	786	46.68	16.84
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	SHRRILXDDS0	SHERRARD	2,105	29.73	70.80
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	SHWYILXCDS0	SHUMWAY	3,857	64.65	59.66
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	SRNTILXCRS0	SORENTO	1,249	37.81	33.04
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	STEMILXERS0	ST ELMO	2,222	58.25	38.15
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	STPRILXERS0	ST PETER	1,496	103.17	14.50
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	STRNILXDRS0	STRONGHURST	1,835	88.85	20.65
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	STTRILXCRS0	SUTTER	512	58.30	8.78
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	TAMRILXERS0	TAMAROA	1,977	78.47	25.19
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	TMPCILXADS0	TAMPICO	2,163	111.23	19.45
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	TTPLILXDDS0	TEUTOPOLIS	3,335	29.68	112.38
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	THMSILXARS0	THOMAS (WHITESIDE CO)	432	43.96	9.83
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	WTVLILXERS0	WALTONVILLE	1,700	79.20	21.47
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	WRSWILXCRS0	WARSAW	2,084	64.31	32.40
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	WTSNILXCDS0	WATSON	3,965	70.70	56.08
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	WDLWILXEDS0	WOODLAWN	3,658	113.53	32.22
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	UNCOVERED EXCHANGES		223,269	6231.86	35.83
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	EDWDILXERS0	EDGEWOOD	2,340	91.40	25.60
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	FARNILXERS0	FARINA	1,654	79.86	20.71
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	COVERED EXCHANGES		3,994	171.26	23.32
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL	TOTAL		227,263	6403.12	35.49
CITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -IL		DENSITY RATIO OF ETC AREA TO NONETC AREA:			0.65

Creamskimming Analysis for the Illinois Consolidated Telephone Co Area

OCNAME	DOMSWITCH	WIRE CENTER	POP	Land Area (Sqr. Miles)	Population per Square Mile
ILLINOIS CONSOLIDATED TELEPHONE CO.	ASMPILXCRS0	ASSUMPTION	1746	63.45	27.52
ILLINOIS CONSOLIDATED TELEPHONE CO.	BLMNILXCRS0	BLUE MOUND	1721	51.54	33.39
ILLINOIS CONSOLIDATED TELEPHONE CO.	CHTNILXCDS0	CHARLESTON	24951	158.75	157.17
ILLINOIS CONSOLIDATED TELEPHONE CO.	CWDNILXCRS0	COWDEN	1677	77.10	21.75
ILLINOIS CONSOLIDATED TELEPHONE CO.	EDBGILXCRS0	EDINBURG	2259	85.11	26.54
ILLINOIS CONSOLIDATED TELEPHONE CO.	EFHMILXCRS0	EFFINGHAM	12765	24.82	514.26
ILLINOIS CONSOLIDATED TELEPHONE CO.	FRVLILXCRS0	FARMERSVILLE	1597	86.20	18.53
ILLINOIS CONSOLIDATED TELEPHONE CO.	GAYSILXCRS0	GAYS	651	35.74	18.22
ILLINOIS CONSOLIDATED TELEPHONE CO.	HLBOILXCRS0	HILLSBORO	7427	96.85	76.69
ILLINOIS CONSOLIDATED TELEPHONE CO.	IRNGILXCRS0	IRVING	2794	27.53	101.48
ILLINOIS CONSOLIDATED TELEPHONE CO.	KNCDILXCRS0	KINCAID	2624	46.98	55.86
ILLINOIS CONSOLIDATED TELEPHONE CO.	LTFDILXCRS0	LITCHFIELD	8916	102.05	87.37
ILLINOIS CONSOLIDATED TELEPHONE CO.	MABNILXCRS0	MT AUBURN	805	41.89	19.22
ILLINOIS CONSOLIDATED TELEPHONE CO.	MRSVILXCRS0	MORRISONVILLE	1968	104.92	18.76
ILLINOIS CONSOLIDATED TELEPHONE CO.	NKMSILXCRS0	NOKOMIS	3796	139.43	27.23
ILLINOIS CONSOLIDATED TELEPHONE CO.	OWNCILXCRS0	OWANECO	710	51.09	13.90
ILLINOIS CONSOLIDATED TELEPHONE CO.	PANAILXCRS0	PANA	7465	77.82	95.92
ILLINOIS CONSOLIDATED TELEPHONE CO.	RYMNILXCRS0	RAYMOND	1905	101.08	18.85
ILLINOIS CONSOLIDATED TELEPHONE CO.	SGTNILXCRS0	ST0NINGTON	1428	67.85	21.05
ILLINOIS CONSOLIDATED TELEPHONE CO.	SHVLILXCRS0	SHELBYVILLE	7387	109.47	67.48
ILLINOIS CONSOLIDATED TELEPHONE CO.	STBGILXCRS0	STRASBURG	1034	38.61	26.78
ILLINOIS CONSOLIDATED TELEPHONE CO.	STSNILXCRS0	STEWARDSON	1531	68.94	22.21
ILLINOIS CONSOLIDATED TELEPHONE CO.	TWHLILXCRS0	TOWER HILL	1348	67.36	20.01
ILLINOIS CONSOLIDATED TELEPHONE CO.	TYVLILXCDS0	TAYLORVILLE	15897	99.33	160.05
ILLINOIS CONSOLIDATED TELEPHONE CO.	WITTILXCRS0	WITT	1333	39.97	33.35
ILLINOIS CONSOLIDATED TELEPHONE CO.	WNDSILXCRS0	WINDSOR	1593	45.28	35.18
ILLINOIS CONSOLIDATED TELEPHONE CO.	WVLTILXCRS0	WESTERVELT	428	36.66	11.67
ILLINOIS CONSOLIDATED TELEPHONE CO.	UNCOVERED EXCHANGES		117,756	1945.82	60.52
ILLINOIS CONSOLIDATED TELEPHONE CO.	ARCLILXCRS0	ARCOLA	3741	60.14	62.21
ILLINOIS CONSOLIDATED TELEPHONE CO.	ARTHILXCRS0	ARTHUR	5119	78.95	64.84
ILLINOIS CONSOLIDATED TELEPHONE CO.	ASMRILXCRS0	ASHMORE	1154	35.82	32.21
ILLINOIS CONSOLIDATED TELEPHONE CO.	ATWDILXCRS0	ATWOOD	2434	73.01	33.34
ILLINOIS CONSOLIDATED TELEPHONE CO.	HMBLILXCRS0	HUMBOLDT	1042	53.21	19.58
ILLINOIS CONSOLIDATED TELEPHONE CO.	MTONILXCDS0	MATTOON	23278	154.50	150.67
ILLINOIS CONSOLIDATED TELEPHONE CO.	OKLDILXCRS0	OAKLAND	2581	91.95	28.07
ILLINOIS CONSOLIDATED TELEPHONE CO.	SIGLILXCRS0	SIGEL	2477	92.69	26.72
ILLINOIS CONSOLIDATED TELEPHONE CO.	COVERED EXCHANGES		41,826	640.27	65.33
ILLINOIS CONSOLIDATED TELEPHONE CO.	TOTAL		42,868	693.48	61.82
ILLINOIS CONSOLIDATED TELEPHONE CO.		DENSITY RATIO OF ETC AREA TO NONETC AREA:			1.08

Creamskimming Analysis for the Montrose Mutual Telephone Co Area

OCNAME	DOMSWITCH	WIRE CENTER	POP	Land Area - Square Miles	Population per Square Mile
MONTROSE MUTUAL TELEPHONE CO.	DTRCILXCDS0	DIETERICH	1982	61.75	32.10
MONTROSE MUTUAL TELEPHONE CO.	ELTWILXCRS0	ELLIOTSTOWN	452	31.12	14.52
MONTROSE MUTUAL TELEPHONE CO.	UNCOVERED EXCHANGES		2,434	92.87	26.21
MONTROSE MUTUAL TELEPHONE CO.	GILAILXCRS0	GILA	602	51.26	11.74
MONTROSE MUTUAL TELEPHONE CO.	MTRSILXCRS0	MONTROSE	1501	68.94	21.77
MONTROSE MUTUAL TELEPHONE CO.	COVERED EXCHANGES		2,103	120.20	17.50
MONTROSE MUTUAL TELEPHONE CO.	TOTAL		4,537	213.08	21.29
MONTROSE MUTUAL TELEPHONE CO.		DENSITY RATIO OF ETC AREA TO NONETC AREA:			0.67

Creamskimming Analysis for the Odin Telephone Exchange, Inc. Area

OCNAME	DOMSWITCH	WIRE CENTER	POP	Land Area - Square Miles	Population per Square Mile
ODIN TELEPHONE EXCHANGE, INC.	SBNRILXEDS0	SHOBONIER	892	53.71	16.61
ODIN TELEPHONE EXCHANGE, INC.	ODINILXEDS0	ODIN	2,206	40.22	54.84
ODIN TELEPHONE EXCHANGE, INC.	UNCOVERED EXCHANGES		3,098	93.94	32.98
ODIN TELEPHONE EXCHANGE, INC.	MTVIILXCDS1	MARTINSVILLE	2,248	95.34	23.58
ODIN TELEPHONE EXCHANGE, INC.	OBLNILXEDS0	OBLONG	3,336	108.30	30.80
ODIN TELEPHONE EXCHANGE, INC.	COVERED EXCHANGES		5,584	203.64	27.42
ODIN TELEPHONE EXCHANGE, INC.	TOTAL		8,682	297.58	29.18
ODIN TELEPHONE EXCHANGE, INC.		DENSITY RATIO OF ETC AREA TO NONETC AREA:			0.83

Creamskimming Analysis for the Verizon South, Inc. Area

OCNAME	DOMSWITCH	WIRE CENTER	POP	Land Area (Sqr. Miles)	Population per Square Mile
VERIZON SOUTH, INC.	BESNILXCRS0	BEASON	616	40.35	15.27
VERIZON SOUTH, INC.	BDVLILXCRS0	BONDVILLE	691	20.94	33.00
VERIZON SOUTH, INC.	CSPKILXARS0	CISSNA PARK	2,138	113.49	18.84
VERIZON SOUTH, INC.	CGVLILXDRS0	CONGERVILLE	672	11.40	58.97
VERIZON SOUTH, INC.	DNFTILXARS0	DANFORTH	955	51.50	18.54
VERIZON SOUTH, INC.	DRCKILXDRS0	DEER CREEK	1,061	23.05	46.02
VERIZON SOUTH, INC.	EMDNILXCRS0	EMDEN	816	47.59	17.15
VERIZON SOUTH, INC.	FSHRILXCRS0	FISHER	2,778	80.23	34.63
VERIZON SOUTH, INC.	FLVLILXCRS0	FLATVILLE	571	42.52	13.43
VERIZON SOUTH, INC.	FSLDILXCRS1	FOOSLAND	1,679	17.37	96.64
VERIZON SOUTH, INC.	GFFRILXCRS1	GIFFORD	1,245	36.11	34.48
VERIZON SOUTH, INC.	GDFDILABRS0	GOODFIELD	1,414	23.66	59.78
VERIZON SOUTH, INC.	HTBGILXCRS0	HARTSBURG	546	27.17	20.09
VERIZON SOUTH, INC.	IVDLILXCRS0	IVESDALE	557	53.73	10.37
VERIZON SOUTH, INC.	LDLWILXCRS0	LUDLOW	769	27.91	27.55
VERIZON SOUTH, INC.	MLFRILXADS0	MILFORD	1,982	72.84	27.21
VERIZON SOUTH, INC.	PNFDILXCRS0	PENFIELD	465	33.89	13.72
VERIZON SOUTH, INC.	PSTMILXCRS0	PESOTUM	928	40.01	23.19
VERIZON SOUTH, INC.	PHILILXCRS0	PHILO	1,915	55.97	34.21
VERIZON SOUTH, INC.	RNTLILXCDS0	RANTOUL	14,039	59.83	234.65
VERIZON SOUTH, INC.	SDRSILXCRS0	SADORUS	729	31.98	22.79
VERIZON SOUTH, INC.	SECRILXDRS0	SECOR	1,290	47.51	27.15
VERIZON SOUTH, INC.	SYMRILXCRS1	SEYMOUR	1,396	38.81	35.97
VERIZON SOUTH, INC.	STLDILXARS1	STOCKLAND	396	62.84	6.30
VERIZON SOUTH, INC.	THBOILXCRS0	THOMASBORO	2,228	53.45	41.69
VERIZON SOUTH, INC.	TLONILXCDS0	TOLONO	3,150	36.36	86.64
VERIZON SOUTH, INC.	WGTNILXARS0	WELLINGTON	507	42.28	11.99
VERIZON SOUTH, INC.	WDLDILXARS0	WOODLAND	909	65.75	13.83
VERIZON SOUTH, INC.	UNCOVERED EXCHANGES		46,442	1258.54	36.90
VERIZON SOUTH, INC.	ARMSILXCRS0	ARMSTRONG	513	40.32	12.72
VERIZON SOUTH, INC.	CASYILXCDS0	CASEY	5,397	141.94	38.02
VERIZON SOUTH, INC.	CYVLILXCRS1	CHENEYVILLE	271	39.12	6.93
VERIZON SOUTH, INC.	CLSNILXCRS0	COLLISON	494	49.50	9.98
VERIZON SOUTH, INC.	ELYNILXCRS0	EAST LYNN	297	20.70	14.34
VERIZON SOUTH, INC.	GNUPILXCRS0	GREENUP	3,029	87.77	34.51
VERIZON SOUTH, INC.	HPTNILXCRS0	HOOPESTON	6,363	53.89	118.07
VERIZON SOUTH, INC.	KNSSILXCRS0	KANSAS	1,216	58.73	20.71
VERIZON SOUTH, INC.	NEOGILXCRS1	NEOGA	4,439	103.14	43.04
VERIZON SOUTH, INC.	OGDNILXCRS0	OGDEN	1,108	23.77	46.61
VERIZON SOUTH, INC.	PTMCILXCRS0	POTOMAC	891	19.41	45.90
VERIZON SOUTH, INC.	RNKNILXCRS0	RANKIN	908	48.80	18.61
VERIZON SOUTH, INC.	ROYLILXCRS0	ROYAL	497	18.56	26.78

Creamskimming Analysis for the Verizon South, Inc. Area

VERIZON SOUTH, INC.	TOLDILXCRS0	TOLEDO	3,209	93.36	34.37
VERIZON SOUTH, INC.	WSFDILXCRS0	WESTFIELD	1,082	57.13	18.94
VERIZON SOUTH, INC.	COVERED EXCHANGES		29,714	856.14	34.71
VERIZON SOUTH, INC.	TOTAL		76,156	2114.68	36.01
VERIZON SOUTH, INC.		DENSITY RATIO OF ETC AREA TO NONETC AREA:			0.94

Creamskimming Analysis for the Wabash Telephone Cooperative, Inc. Area

OCNAME	DOMSWITCH	WIRE CENTER	POP	Land Area (Sqr. Miles)	Population per Square Mile
WABASH TELEPHONE COOPERATIVE INC.	CRSPILXERS0	CRISP	532	50.10	10.62
WABASH TELEPHONE COOPERATIVE INC.	OCVLILXERS0	ORCHARDVILLE	406	29.55	13.74
WABASH TELEPHONE COOPERATIVE INC.	BRNSILXERS0	BROWNS	945	58.51	16.15
WABASH TELEPHONE COOPERATIVE INC.	GEFFILXERS0	GEFF	1,211	72.02	16.82
WABASH TELEPHONE COOPERATIVE INC.	UNCOVERED EXCHANGES		3,094	210.18	14.72
WABASH TELEPHONE COOPERATIVE INC.	BBGVILXERS0	BIBLE GROVE	968	69.46	13.94
WABASH TELEPHONE COOPERATIVE INC.	CISNILXEDS0	CISNE	1,976	97.88	20.19
WABASH TELEPHONE COOPERATIVE INC.	LSVLILXEDS0	LOUISVILLE	2,303	82.04	28.07
WABASH TELEPHONE COOPERATIVE INC.	MTERILXERS0	MOUNT ERIE	1,097	140.22	7.82
WABASH TELEPHONE COOPERATIVE INC.	XENIILXERS0	XENIA	1,147	70.63	16.24
WABASH TELEPHONE COOPERATIVE INC.	COVERED EXCHANGES		7,491	460.25	16.28
WABASH TELEPHONE COOPERATIVE INC.	TOTAL		10,585	670.42	15.79
WABASH TELEPHONE COOPERATIVE INC.		DENSITY RATIO OF ETC AREA TO NONETC AREA:			1.11