

**Table 4**

**ILEC End-User (Retail) and Wholesale Switched Access Lines, VoIP Subscriptions, and UNEs<sup>1</sup>  
(Lines, Subscriptions, and UNEs in Thousands)**

Date	Reporting ILECs <sup>2</sup>	ILEC Total Lines <sup>3</sup>	End-User Switched Access Lines	VoIP	Switched Access Lines and UNEs Provided to CLECs					
					Resold Lines	UNEs			Total UNEs & Resold Lines	% of Total Lines
						Without Switching	With Switching <sup>4</sup>	Total UNEs		
Dec 1999	168	187,190	181,203	-	4,494	1,004	489	1,493	5,987	3.2 %
Jun 2000	159	188,058	179,679	-	5,098	1,696	1,616	3,312	8,409	4.5
Dec 2000	166	188,223	177,561	-	5,388	2,436	2,838	5,274	10,662	5.7
Jun 2001	156	187,092	174,752	-	4,417	3,161	4,761	7,922	12,340	6.6
Dec 2001	164	185,391	171,917	-	4,014	3,679	5,781	9,460	13,474	7.3
Jun 2002	166	182,345	167,330	-	3,475	4,061	7,478	11,540	15,015	8.2
Dec 2002	174	181,616	164,386	-	2,743	4,259	10,227	14,487	17,229	9.5
Jun 2003	181	177,770	158,275	-	2,232	4,227	13,036	17,263	19,495	11.0
Dec 2003	185	174,453	153,158	-	1,833	4,287	15,176	19,463	21,296	12.2
Jun 2004	185	171,050	147,993	-	1,600	4,322	17,136	21,458	23,057	13.5
Dec 2004	190	167,063	144,810	-	1,490	4,217	16,546	20,763	22,253	13.3
Jun 2005	757	164,449	143,758	-	1,796	4,300	14,596	18,895	20,691	12.6
Dec 2005	807	160,881	143,773	-	1,793	4,469	10,846	15,315	17,108	10.6
Jun 2006	805	156,872	142,293	-	1,723	4,413	8,443	12,856	14,579	9.3
Dec 2006	814	151,958	138,834	-	1,613	4,408	7,103	11,511	13,124	8.6
Jun 2007	816	146,672	134,640	-	1,517	4,285	6,230	10,515	12,032	8.2
Dec 2007	805	140,808	129,693	-	1,460	4,122	5,534	9,655	11,115	7.9
Jun 2008	800	134,846	124,606	-	1,473	3,827	4,941	8,768	10,241	7.6
Dec 2008	777	128,288	117,968	529	3,209	3,844	2,740	6,583	9,792	7.6
Jun 2009	778	121,884	111,790	958	3,012	3,580	2,543	6,123	9,136	7.5
Dec 2009	768	116,474	105,826	1,592	2,993	3,668	2,396	6,063	9,056	7.8

Some data for December 2008 and June 2009 have been revised. Figures may not sum to totals due to rounding.

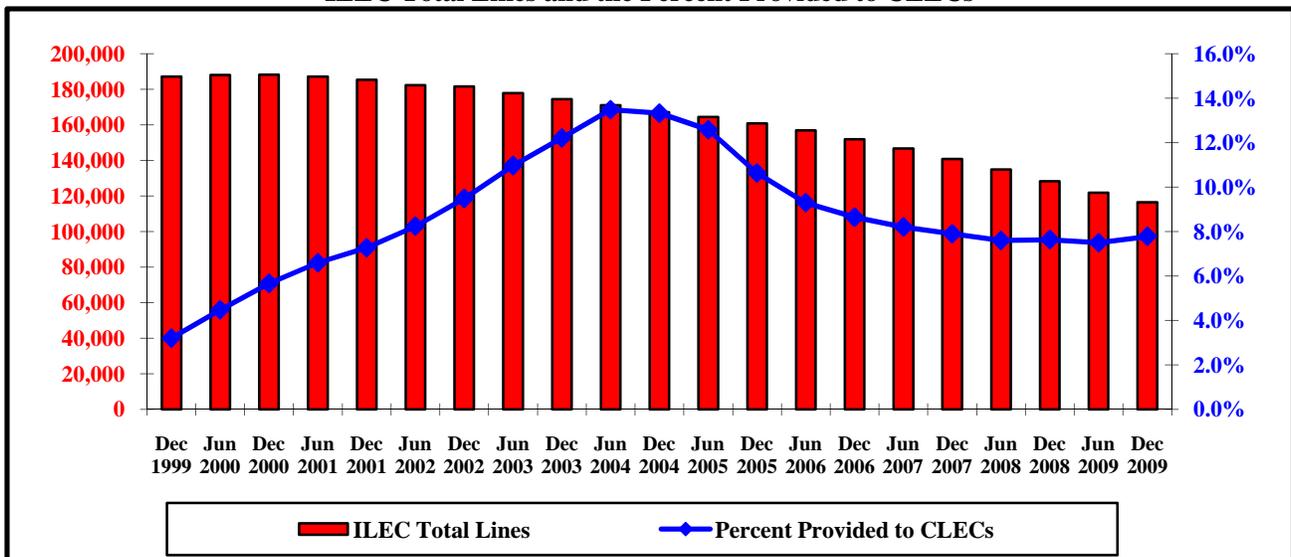
<sup>1</sup> See footnote 1, Table 1.

<sup>2</sup> Fewer ILECs were counted after mid-year 2007 primarily because FCC staff identified additional common-control relationships.

<sup>3</sup> Sum of ILEC-reported end-user (retail) switched access lines, ILEC interconnected VoIP subscriptions, and ILEC wholesale switched access lines and UNEs provided to CLECs.

<sup>4</sup> ILEC loops provided with ILEC switching, including the combination of ILEC loop UNE, switching UNE, and transport UNE, collectively referred to as the UNE-Platform ("UNE-P"). In the *Triennial Review Remand Order*, which was adopted on December 15, 2004, the Commission directed CLECs to migrate their retail customers served by these methods to alternative arrangements by March 11, 2006, i.e., within 12 months of the date the order went into effect. See C.F.R. § 51.319(d)(2)(ii).

**Chart 4  
ILEC Total Lines and the Percent Provided to CLECs**



**Per-Minute Cost of Wireless Service  
(Including USF Contributions)**

**(1995-2007)**

Sources: FCC, *Trends in Telephone Service*, Table 19.17 (Feb. 2007); *Implementation of Section 6002(b) of the Omnibus Budget Reconciliation Act of 1993 – Annual Report and Analysis of Competitive Market Conditions With Respect to Commercial Mobile Services*, WT Docket No. 06-17, *Twelfth Report*, FCC 08-28 (rel. Feb. 4, 2008), at para. 201 (Table 14)

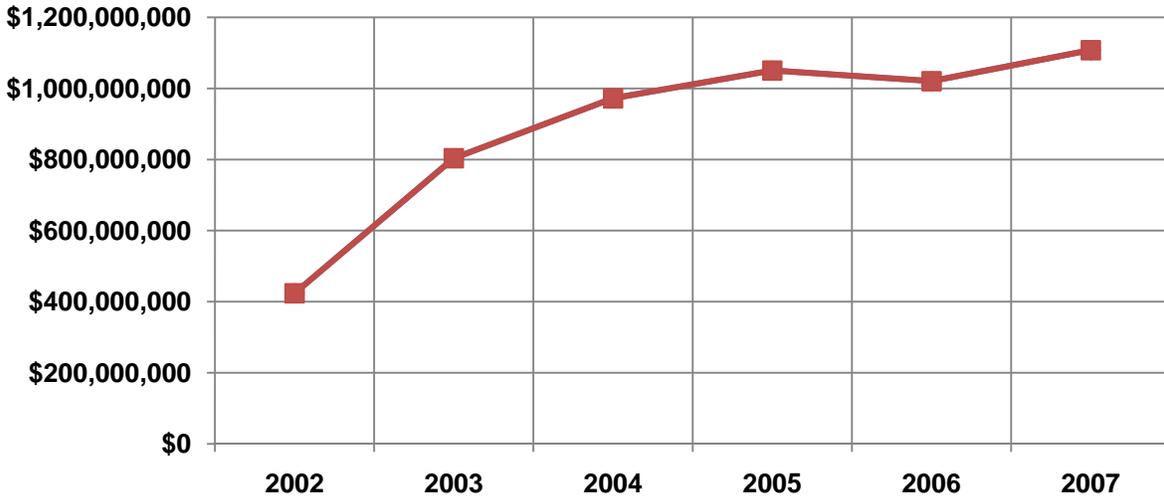
YEAR	(A) AVERAGE REVENUE PER VOICE MINUTE (\$) <sup>1/</sup>	(B) CONTRIBUTION FACTOR (%) <sup>2/</sup>	(C) PER MINUTE COST OF CONTRIBUTION FACTOR (\$) <sup>3/</sup>	TOTAL COST PER MINUTE (\$) (A) + (C)
1995	0.4300			
1996	0.3800			
1997	0.3700			
1998	0.2900	3.1625	0.0092	0.2992
1999	0.2200	3.0143	0.0066	0.2266
2000	0.1800	5.6980	0.0103	0.1903
2001	0.1200	6.8445	0.0082	0.1282
2002	0.1100	7.1625	0.0079	0.1179
2003	0.1000	8.7701	0.0088	0.1088
2004	0.0800	8.8000	0.0079	0.0879
2005	0.0600	10.5500	0.0074	0.0674
2006	0.0600	10.1750	0.0071	0.0671
2007	NA	10.9250		

<sup>1/</sup> Data covers the last six months of each year.

<sup>2/</sup> The listed number for years 1998-2007 is an average of the four quarterly contribution factors.

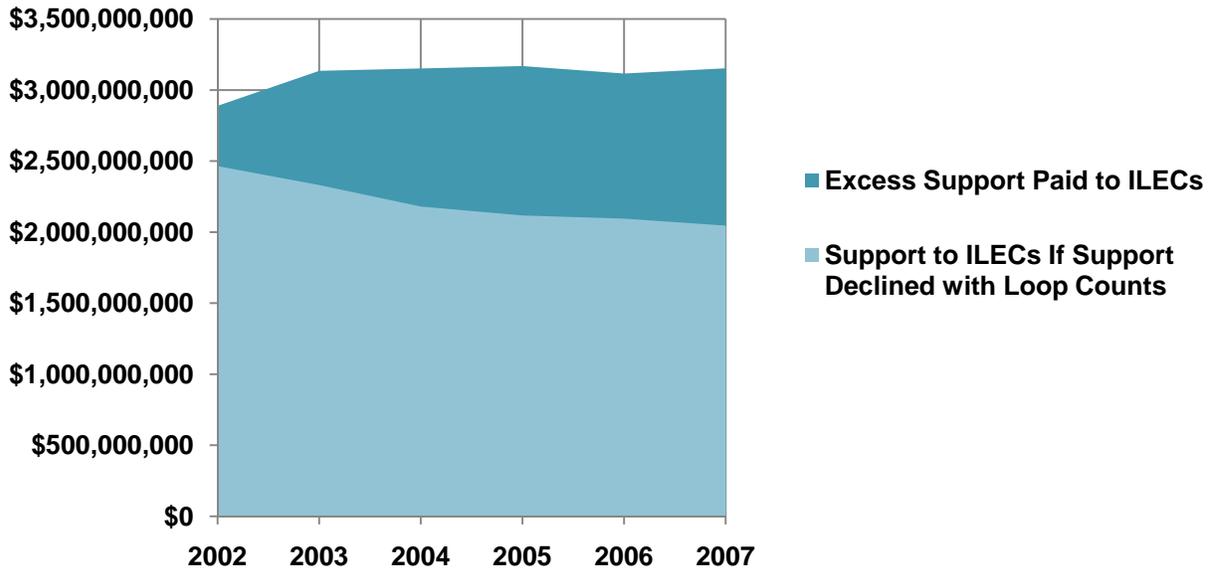
<sup>3/</sup> Calculated by multiplying the average revenue per minute (A) by the contribution factor (B)

### Amount of Potential Savings if ILEC Support Declined at Same Rate as Loop Counts



NOTE: Loop counts are as of June of each year, except for 2007 (December 2006 figures used)

### Excess Support Received by ILECs Because Funding Did Not Account for Declines in Loop Counts



## Dual Purpose Network Language:

Contrary to the arguments of some commenters, use of support to invest in infrastructure capable of providing access to advanced services does not violate section 254(e), which mandates that support be used "only for the provision, maintenance, and upgrading of facilities and services for which the support is intended." The public switched telephone network is not a single-use network. Modern network infrastructure can provide access not only to voice services, but also to data, graphics, video, and other services. High-cost loop support is available to rural carriers "to maintain existing facilities and make prudent facility upgrades[.]" ***Thus, although the high-cost loop support mechanism does not support the provision of advanced services, our policies do not impede the deployment of modern plant capable of providing access to advanced services. Rural carriers may consider both their present and future needs in determining what plant to deploy, knowing that prudent investment will be eligible for support.*** The measures that we adopt in this Order will increase incentives for carriers to modernize their plant by increasing the total amount of high-cost loop support available under the cap.

201. As we move forward in the future, we will consider ways to ensure that we do not create regulatory barriers to the deployment of advanced services. ***The principal thrust of the "no barriers" proposal appears to be that the Commission should require carriers to deploy plant capable of providing access to advanced services, and encourage them to replace plant that cannot provide such access.*** Moreover, we believe any specific policies we adopt in this area should apply uniformly to all local exchange carriers, rather than as part of a transitional high-cost support mechanism for rural carriers. Therefore, we believe that the "no barriers" policy as specifically proposed by the Rural Task Force should be considered further in connection with our comprehensive review of the high-cost loop support mechanisms for rural and non-rural carriers. ***In accordance with our mandate under section 706, we will continue to examine whether deployment of advanced telecommunications capability to all Americans is progressing in a reasonable and timely manner, and to consider means by which we can stimulate the further deployment of access to advanced services.*** (emphasis added).<sup>1</sup>

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<sup>1</sup> Federal-State Joint Board on Universal Service, Fourteenth Report and Order, Twenty-Second Order on Reconsideration, and Further Notice of Proposed Rulemaking in CC Docket No. 96-45, and Report and Order in CC Docket No. 00-256 Multi-Association Group (MAG) Plan for Regulation of Interstate Services of Non-Price Cap Incumbent Local Exchange Carriers and Interexchange Carriers, 16 FCC Rcd 11,244, 11322-23 (2001) ("MAG Order").