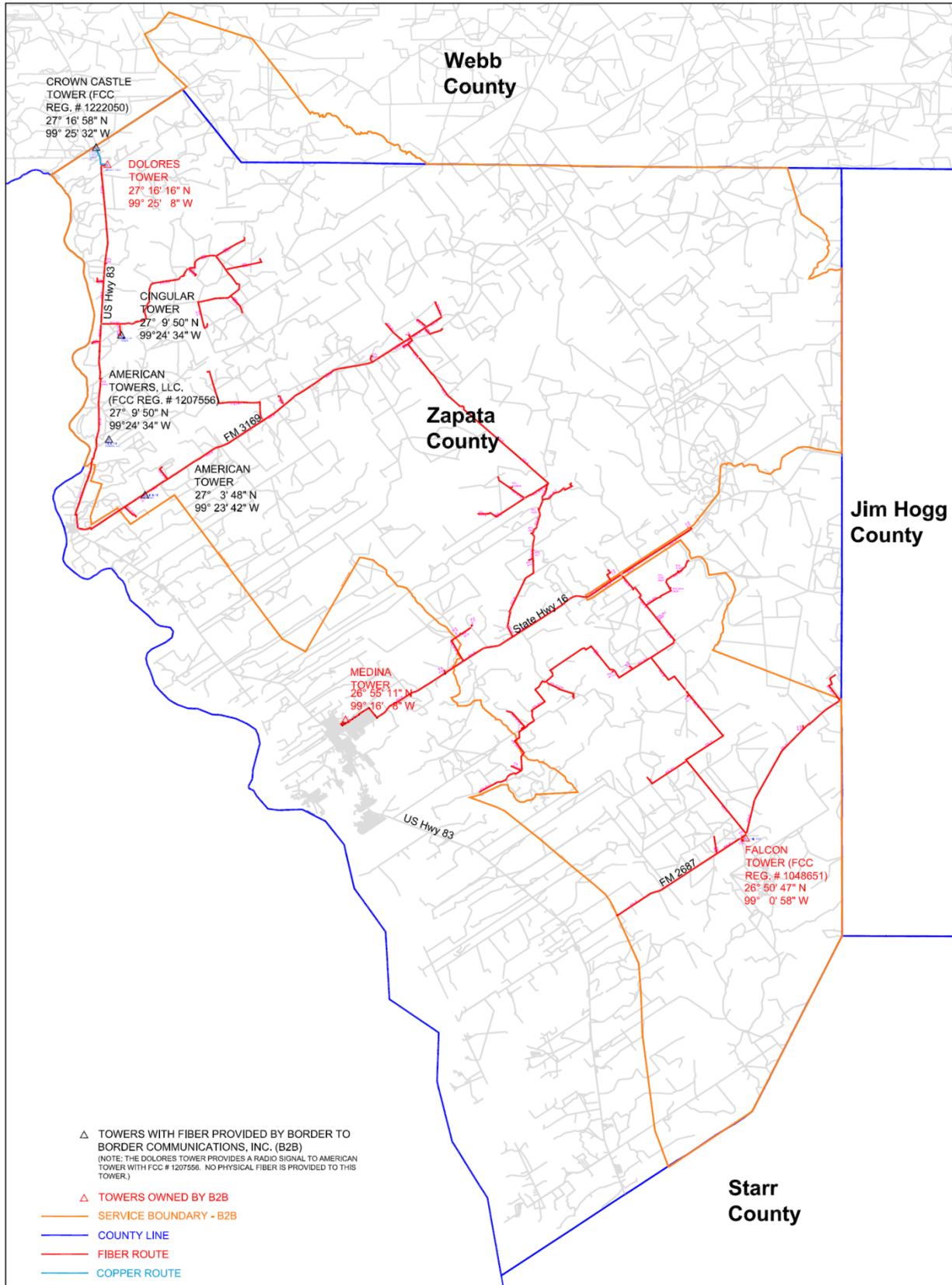


Border to Border Communications, Inc.

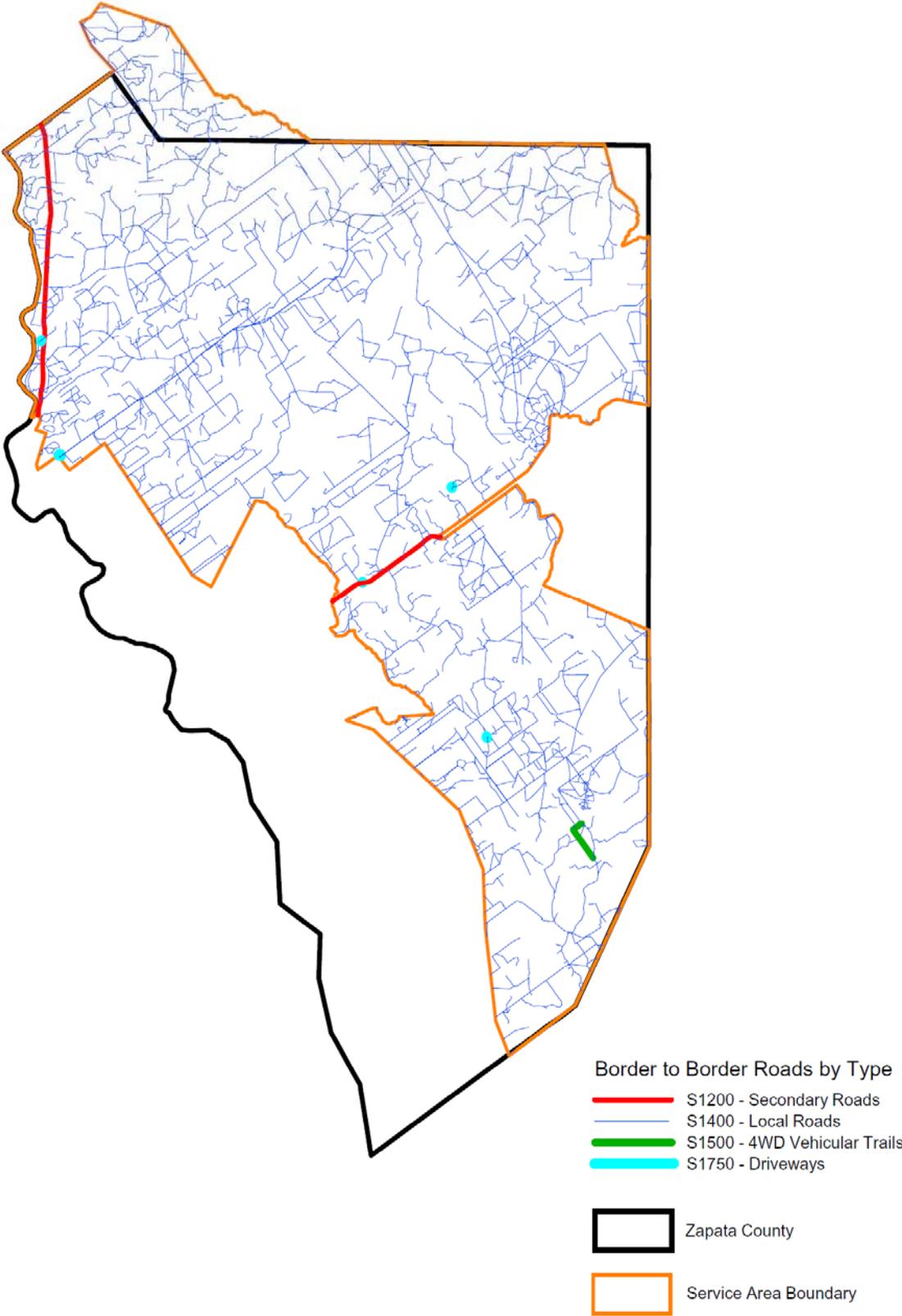
EXHIBIT 1

Maps

# Border to Border Communications, Inc. Service Area With Fiber Routes and Served Towers



# Roads in Border to Border Service Area



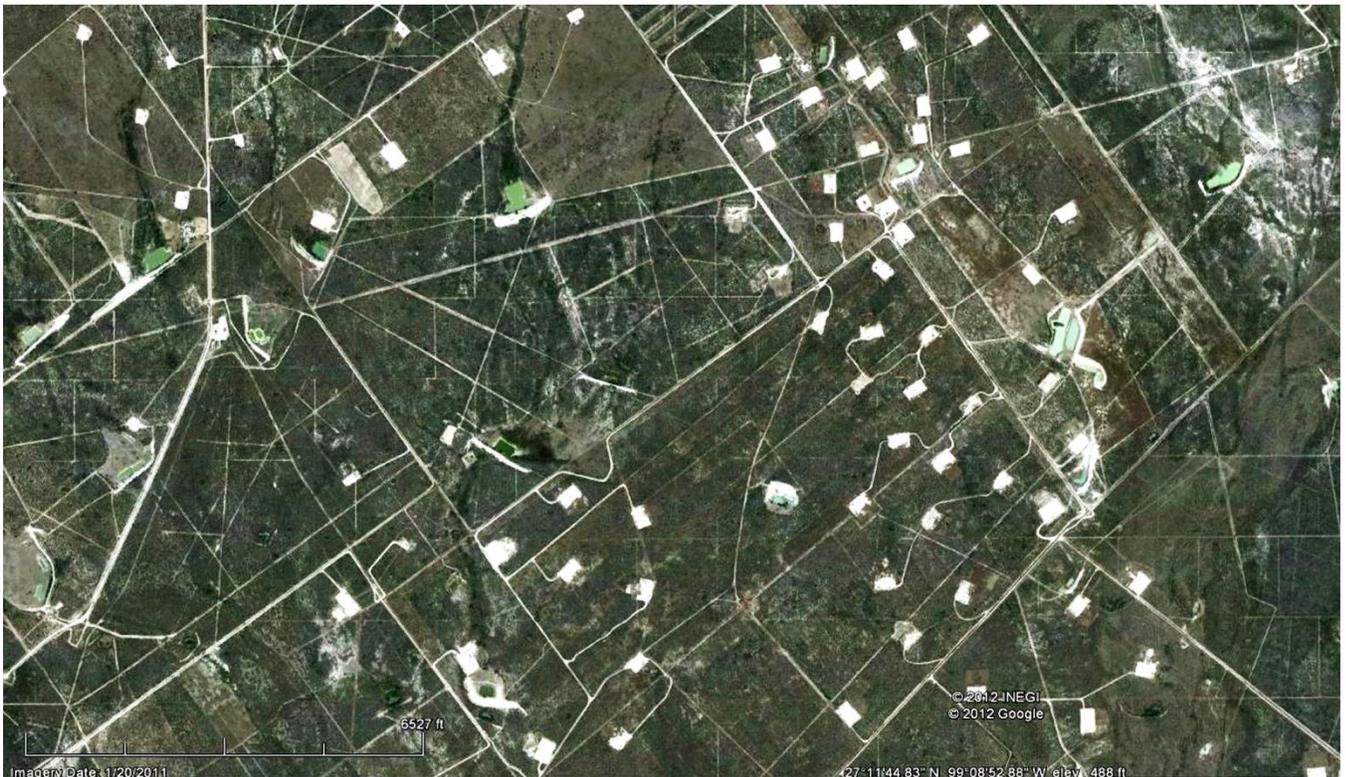
## Border to Border Communications, Inc. Typical Natural Gas Gathering Facilities in Border to Border Service Area



The entire service area of Border to Border Communications, Inc. is heavily populated by natural gas collection pipelines and unpaved roads used for access to those pipelines. The satellite photo to the left shows an inset area approximately four miles wide that has an example of the type of natural gas collection facilities found throughout the entire 760 square mile area.

The photo below shows the inset area in more detail. Each of the small rectangular white areas is a gas well site. The sites are interconnected with gathering pipelines and access roads.

As explained in the waiver narrative, these lines and access roads cause increased costs of constructing and maintaining telecommunications facilities serving the area.



Border to Border Communications, Inc.

EXHIBIT 2

Accounting of Spare Equipment

Spare Fiber Capacity Detail

**Border to Border Communications, Inc.**

Route Description	IX ROUTE DETAIL					DS1 Allocation			Cost Assignment of Spare Fibers		
	Total Cost	Total Fibers	Cost/Fiber	Spare Fibers	Total Spare Cost	Toll	WB	Total	Toll	WB	Total
Fiber to AT&T POC	\$104,036	12	\$8,670	8	\$69,357	\$20,229	\$14,449	\$34,679	\$40,458	\$28,899	\$69,357

Border to Border Communications, Inc.

EXHIBIT 3

Corporate Operations Expense

Border to Border Communications, Inc.  
 Summary of Corporate Expenses - Year 2011

	<b>Account 6711 Executive Expenses</b>	<b>Account 6721 Accounting General</b>	<b>Account 6721 Accounting/ Cost Consultant</b>	<b>Account 6722.11 External Relations</b>	<b>Account 6725 Legal Expenses</b>	<b>Account 6728 Other Gen &amp; Admin</b>	<b>Total Corporate Expenses</b>
<i>Advertising/Marketing</i>	\$0.00	\$0.00	\$0.00	\$674.88	\$0.00	\$0.00	\$674.88
<i>Annual Membership Dues</i>	\$0.00	\$0.00	\$0.00	\$8,025.00	\$0.00	\$4,896.81	\$12,921.81
<i>Bank Fees</i>	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,255.87	\$2,255.87
<i>Accounting</i>	\$0.00	\$183,934.87	\$0.00	\$0.00	\$0.00	\$0.00	\$183,934.87
<i>Adjustments</i>	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	(\$2.98)	(\$2.98)
<i>General Admin</i>	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$40,156.28	\$40,156.28
<i>Donations - Community</i>	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$750.00	\$750.00
<i>Director/Officer Insurance</i>	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,369.22	\$3,369.22
<i>Wireless Phones</i>	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$4,932.64	\$4,932.64
<i>Regulatory Entities</i>	\$0.00	\$0.00	\$0.00	\$5,237.50	\$0.00	\$0.00	\$5,237.50
<i>Phone Access</i>	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$19,692.80	\$19,692.80
<i>Training</i>	\$0.00	\$0.00	\$0.00	\$2,117.00	\$0.00	\$0.00	\$2,117.00
<i>Outside Accounting</i>	\$0.00	\$43,920.00	\$0.00	\$0.00	\$0.00	\$0.00	\$43,920.00
<i>GVNW (Consulting)</i>	\$0.00	\$0.00	\$42,684.00	\$13,673.10	\$0.00	\$0.00	\$56,357.10
<i>Audit Fees</i>	\$0.00	\$0.00	\$17,975.00	\$0.00	\$0.00	\$0.00	\$17,975.00
<i>Management Fees</i>	\$108,133.34	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$108,133.34
<i>Legal Fees</i>	\$0.00	\$0.00	\$0.00	\$0.00	\$1,378.74	\$0.00	\$1,378.74
<i>Meals (business mtgs)</i>	\$20.51	\$90.51	\$0.00	\$204.32	\$0.00	\$72.75	\$388.09
<i>Meeting Registrations</i>	\$299.37	\$0.00	\$0.00	\$149.00	\$0.00	\$100.00	\$548.37
<i>Miscellaneous</i>	\$375.00	\$0.00	\$0.00	\$4,836.73	\$0.00	\$131.15	\$5,342.88
<i>Office Phone Service</i>	\$0.00	\$95.23	\$0.00	\$0.00	\$0.00	\$2,713.83	\$2,809.06
<i>Postage</i>	\$0.00	\$73.65	\$0.00	\$141.89	\$0.00	\$1,462.66	\$1,678.20
<i>Supplies</i>	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,209.65	\$1,209.65
<i>Travel Expenses</i>	\$0.00	\$1,281.93	\$0.00	\$974.25	\$0.00	\$0.00	\$2,256.18
<i>Fee for INET Management</i>	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$18,037.29	\$18,037.29
	\$108,828.22	\$229,396.19	\$60,659.00	\$36,033.67	\$1,378.74	\$99,777.97	\$536,073.79

Border to Border Communications, Inc.

EXHIBIT 4

Cost Allocation Procedures

## **Cost Allocation Procedures**

Cost Allocation procedures are used in separating regulated and non-regulated costs. The following pages detail the specific procedures to be used by the Company for each USOA Part 32 account (or group of accounts, as the case may be) in separating the non-regulated and regulated costs. The information is arranged as follows:

### Account Number

Gives the account (or group of accounts) to be segregated into non-regulated and regulated costs.

### Account Description

Describes the account or accounts to be segregated.

### Cost Pool Description

Describes the individual cost pools into which the account or accounts will be separated for further segregation into regulated or non-regulated costs. Cost pools are homogeneous groups of costs which can be uniquely determined from the whole account (or group of accounts) through some identification procedure (see Cost Pool Basis).

### Cost Pool Basis

Gives the basis for the segregation of the account or accounts into the separately identified Cost Pools.

### Apportionment Basis

Describes the basis of separating the Cost Pools into their regulated and non-regulated components.

As is noted in the Cost Allocation procedures on the next few pages, Billing & Collection Services and Private Line and Special Access investments and expenses will be identified through the use of the Part 36/69 Cost Allocation Procedures. Part 36/69 procedures use a fully allocated costing methodology to separate costs into jurisdictions and into specific elements, such as Billing & Collection, Private Line and Special Access. Although it has only been specifically noted for certain major accounts (such as the cable and wire facilities accounts), the Part 36/69 allocations would impact other accounts (i.e. executive expense) in the development of a fully allocated cost.

Cost Allocation Procedures

Part 32 Account 32B / 32A	Account Description	Cost Pool Description	Cost Pool Basis	Apportionment Basis
1220/1220	Materials & Supplies (M & S)	1220.1 M & S Regulated	Cost pool equals account	Directly assign to regulated
		1220.2 M & S Non-regulated	Cost pool equals account	Directly assign to non-regulated
1406/1406	Non-regulated Investments	same as account	Cost pool equals account	Directly assign to non-regulated
1439/1439	Deferred Charges	Regulated	Analysis of account	Directly assign to regulated
		Non-regulated	Analysis of account	Directly assign to non-regulated
		Common	Remainder of account	Allocate based on the General allocator
2002/2002	Property held for Future Use	same as account	Cost pool equals account	Directly assign based on analysis of entries to account
2003/2003	Telecommunications Plant Under Construction - Short-term	same as account	Cost pool equals account	Directly assign based on analysis of job orders
2004/2004	Telecommunications Plant Under Construction - Long-term	same as account	Cost pool equals account	Directly assign based on analysis of job orders
2005/2005	Telecommunications Plant Acquisition Adjustment	same as account	Cost pool equals account	Directly assign based on analysis of entries to account
2110/2111	Land	Regulated	Analysis of account	Directly assign to regulated
		Non-regulated	Analysis of account	Directly assign to non-regulated
		Common	Analysis of account	Allocate based on direct reg/nonreg plant assets (Asset Allocator)
2110/2112	Motor vehicles	Regulated	Analysis of accounts and usage logs	Directly assign to regulated
2110/2114	Special Purpose Vehicles	Non-regulated	Analysis of accounts and usage logs	Directly assign to non-regulated
		Common General Office Vehicles	Analysis of accounts	Indirectly assign based on reg/nonreg general office wages (N/A for Border)
		Common Plant Vehicles	Analysis of accounts	Indirectly assign based on reg/non-reg plant specific expenses
2110/2115	Garage Equipment	same as account	Cost pool equals account	Indirectly assign based on reg/non-reg plant specific expenses
2110/2116	Other Work Equipment	Regulated	Analysis of account	Directly assign to regulated
		Non-regulated	Analysis of account	Directly assign to non-regulated
		Common	Analysis of account	Indirectly assign based on reg/non-reg plant specific expenses

Cost Allocation Procedures

Part 32 Account 32B / 32A	Account Description	Cost Pool Description	Cost Pool Basis	Apportionment Basis
2110/2121	Buildings	Regulated	Analysis of account	Directly assign to regulated
		Non-regulated	Analysis of account	Directly assign to non-regulated
		Common	Analysis of account	Indirectly assign based on Asset Allocator
2110/2122	Furniture	same as accounts	Cost pool equals	Indirectly assign based on
2110/2123	Office Equipment		accounts	Asset Allocator
2110/2124	General Purpose Computers	Regulated	Analysis of account	Directly assign to regulated
		Non-regulated	Analysis of account	Directly assign to non-regulated
		Common	Remainder of account	Indirectly assign based on reg/non-reg revenues
2210/2211	Analog Electronic Switching	Regulated	Analysis of accounts	Directly assign to regulated
2210/2212	Digital Electronic Switching	Non-regulated	Analysis of accounts	Directly assign to non-regulated
2210/2215	Electro-mechanical Switching	Common	Analysis of accounts	Indirectly assign based on reg/non-reg switching investments
2230/2231	C.O. Transmission Equipment	Regulated	Analysis of accounts	Directly assign to regulated
2230/2232	Radio Systems	Non-regulated	Analysis of accounts	Directly assign to non-regulated
		Common	Analysis of accounts	Indirectly assign based on reg/non-reg transmission investments
2310/2311	Station Apparatus	same as accounts	Cost pool equals	Directly assign to non-regulated
2310/2321	Customer Premise Wiring		accounts	
2310/2341	Large Private Branch Exchanges			
2310/2351	Public Tel. Terminal Eqpt	Non-regulated	Analysis of accounts	Directly assign to non-regulated
2310/2362	Other Terminal Equipment	Non-regulated	Analysis of accounts	Directly assign to non-regulated
2410/2411	Poles	Regulated	Analysis of accounts	Directly assign to regulated
2410/2421	Aerial Cable	Non-regulated	Analysis of accounts	Directly assign to non-regulated
2410/2422	Underground Cable	Joint Use	Analysis of accounts	Shared facilities between reg/non-reg are analyzed and directly assigned
2410/2423	Buried Cable			
2410/2424	Submarine Cable			
2410/2425	Deep Sea Cable			
2410/2426	Intrabuilding Network Cable			
2410/2431	Aerial Wire			
2410/2441	Conduit Systems			

Cost Allocation Procedures

Part 32 Account 32B / 32A	Account Description	Cost Pool Description	Cost Pool Basis	Apportionment Basis
3100/3100	Accum Depr-Motor Vehicles	same as accounts	Cost pool equals accounts	Follow allocation of plant assets
3100/3100	Accum Depr-Garage Work Equipment			
3100/3100	Accum Depr-Other Work Equipment			
3100/3100	Accum Depr-Buildings			
3100/3100	Accum Depr-Furn & Office Eqpt			
3100/3100	Accum Depr-Gen'l Purp Computers			
3100/3100	Accum Depr-Switching Equipment			
3100/3100	Accum Depr-Operator Systems			
3100/3100	Accum Depr-Circuit Equipment			
3100/3100	Accum Depr-I/W & CPE			
3100/3100	Accum Depr-Public Tel. & Oth Term			
3100/3100	Accum Depr-Cable and Wire Facilities			
3200/3200	Accum Depr-Held For Future Use	same as account	Cost pool equals account	Follow allocation of plant assets
3600/3600	Accum Amort-Other(Plt Acq Adj)	same as account	Cost pool equals account	Follow allocation of plant asset
4310	Post Retirement Benefits	same as account	Cost pool equals account	Follow allocation of Big 3 Expenses
5000/5000- 5084.x	Local Revenue State Rev. (except Special Access)	Regulated	Analysis of accounts	Directly assign to regulated
5100/5100- 5169	Interstate Revenues Long Distance Netwk. Svcs. Rev.	Non-regulated	Analysis of accounts	Directly assign to non-regulated
5084/5084.x	State Special Access Revenues	same as accounts	Cost pool equals accounts	Directly assign to regulated for allocation purposes. Investment and expenses will be identified through Part 36 allocations
5200/5240	Rent Revenues	Regulated	Analysis of account	Directly assign to regulated
		Non-regulated	Analysis of account	Directly assign to non-regulated
		Common	Analysis of account	Follow allocation of Building Asset

Cost Allocation Procedures

Part 32 Account 32B / 32A	Account Description	Cost Pool Description	Cost Pool Basis	Apportionment Basis
5200-5230. 5250- 5269	Miscellaneous Revenue, Customer Operations Revenue, Directory Revenue and Incidental Regulated Revenue	Regulated  Non-regulated	Analysis of accounts  Analysis of accounts	Directly assign to regulated  Directly assign to non-regulated
5200/5270	Billing and Collection Revenue	same as accounts	Cost pool equals accounts	Directly assign to regulated for allocation purposes. Investment and expenses will be identified through Part 36 allocations
5280/5280	Inside Wire and Other Non-regulated Revenue	same as accounts	Cost pool equals accounts	Directly assign to non-regulated
5200/5260	Operater services Revenue	same as accounts	Cost pool equals accounts	Directly assign based on analysis
5300/5301- 5302	Uncollectible Revenue- Telecommunications and Other	Regulated Non-regulated	Analysis of accounts Analysis of accounts	Directly assign to regulated Directly assign to non-regulated
6110/6112 6110/6114	Motor Vehicle Expense Special Purpose Vehicle expense	same as accounts	Cost pool equals accounts	Follow allocation of plant assets
6110/6115	Garage Equipment Expense	same as accounts	Cost pool equals account	Follow allocation of plant assets
6110/6116	Other Work Equipment expense	same as account	Cost pool equals account	Follow allocation of plant assets
6120/6121	Land and Building expense	same as account	Cost pool equals accounts	Follow allocation of GSF plant assets
6120/6122 6120/6123	Furniture and Artworks expense Office Equipment expense	same as account	Cost pool equals accounts	Follow allocation of GSF plant assets
6120/6124	General Purpose Computer expense	same as account	Cost pool equals accounts	Follow allocation of GSF plant assets
6120/6210- 6215 6212.2 6232.1	Central Office Switching expense Analog Electronic expense Digital Electronic expense Electro-mechanical expense	same as account	Cost pool equals accounts	Follow allocation of plant assets
6230/6230- 6232	C.O. Transmission expense. Radio Systems expense. Circuit Eqpt exp	same as account	Cost pool equals accounts	Follow allocation of plant assets
6310/6311, 6341	Station Apparatus expense Large PBX expense inside wire expense	same as account	Cost pool equals accounts	Directly assign to non-regulated

Cost Allocation Procedures

Part 32 Account 32B / 32A	Account Description	Cost Pool Description	Cost Pool Basis	Apportionment Basis
6310/6351	Public Telephone Terminal equipment expense	same as account	Cost pool equals account	Follow allocation of plant assets
6410/6410- 6441	Cable and Wire Facilities expense	same as account	Cost pool equals accounts	Follow allocation of plant assets
6510/6511	Property Held for Future Use exp	same as account	Cost pool equals account	Follow allocation of plant assets
6510/6512	Provisioning expense	same as account	Cost pool equals account	Indirectly assigned based on reg/nonreg allocation of a/c 1220
6530/6531	Power expense	same as account	Cost pool equals account	Follow allocation of COE a/c 2200
6530/6532	Network Administration expense	same as account	Cost pool equals account	Follow allocation of COE a/c 2200
6530/6533	Testing expense	same as account	Cost pool equals account	Follow allocation of COE a/c 2200
6530/6534	Plant Operations Administration expense	same as account	Cost pool equals account	Indirectly assign based on reg-non-reg plant specific expenses
6530/6535	Engineering expense	Regulated	Analysis of account	Directly assign to regulated
		Non-regulated	Analysis of account	Directly assign to non-regulated
		Common	Analysis of account	Indirectly assign based on Asset Allocator
6540/6540	Access expense	Regulated	Analysis of account	Directly assign to regulated
		Non-regulated	Analysis of account	Directly assign to non-regulated
		Common	Analysis of account	Allocate based on directly-assigned costs
6560/6561	Depreciation Expense: Motor Vehicles Garage Work Equipment Other Work Equipment Buildings Furn & Office Eqpt Gen'l Purp Computers C.O.Switching Equipment Operator Systems Circuit Equipment I/W & CPE Public Tel. & Oth Term Cable and Wire Facilities	same as account	Cost pool equals account	Follow allocation of plant assets

Cost Allocation Procedures

Part 32 Account 32B / 32A	Account Description	Cost Pool Description	Cost Pool Basis	Apportionment Basis
6560/6562	Depr Exp Prop Held for Future Use	same as account	Cost pool equals account	Follow allocation of plant assets
6560/6565	Amortization Expense-Other (Plant Acquisition Adjustment)	same as account	Cost pool equals account	Follow allocation of plant assets
6610/6610- 6613	Marketing Expenses (Product management, Sales & Product Advertising expense)	Regulated	Analysis of accounts	Directly assign based on analysis of entries to account
		Non-regulated	Analysis of accounts	Directly assign based on analysis of entries to account
		Common	Analysis of accounts	Allocate based on the reg/nonreg revenue
6620/6621	Call Completion expense	same as account	Cost pool equals account	Directly assign based on analysis
6620/6622	Number Services expense	same as account	Cost pool equals account	Directly assign to regulated
6620/6623.x	Customer Services expense- Inquiry and Customer Services	same as account	Cost pool equals account	Indirectly assign based on reg/ non-reg revenues(exc. op. svcs.)
6620/6623.x	Customer Services expense- Paystation Collection	same as account	Cost pool equals account	Directly assign based on analysis
6620/6623.x	Customer Services expense- End User (SLC) Billing	same as account	Cost pool equals account	Indirectly assign based on reg/ non-reg revenues
6620/6623.x	Customer Services expense- Local Billing & Collection	same as account	Cost pool equals account	Indirectly assign based on reg/ non-reg revenues
6620/6623.x	Customer Services expense- Toll Processing	same as account	Cost pool equals account	Directly assign to regulated
6620/6623.x	Customer Services expense- CABS	same as account	Cost pool equals account	Directly assign to regulated
6710/6710- 6712	Executive expense Planning expense	Regulated	Analysis of accounts	Directly assign to regulated
		Non-regulated	Analysis of accounts	Directly assign to non-regulated
		Common	Remainder of accts	Indirectly assign based on General Allocator
6720/6721.x	Accounting and Finance	Regulated	Analysis of account	Directly assign to regulated
		Non-regulated	Analysis of account	Directly assign to non-regulated
		Common	Remainder of acct	Allocate based on General Allocator

**Cost Allocation Procedures**

Part 32 Account 32B / 32A	Account Description	Cost Pool Description	Cost Pool Basis	Apportionment Basis
6720/6722	External Relations expense	Regulated	Analysis of account	Directly assign to regulated
		Non-regulated	Analysis of account	Directly assign to non-regulated
		Common	Analysis of account	Allocate based on General Allocator
6720/6723	Human Resources expense	same as account	Cost pool equals account	Indirectly assign based on reg/ non-reg total wages (N/A for Border)
6720/6724	Information Management expense	Regulated	Analysis of account	Directly assign to regulated
		Non-regulated	Analysis of account	Directly assign to non-regulated
		Common	Analysis of account	Allocate based on General Allocator
6720/6725	Legal	Regulated	Analysis of invoices	Directly assign to regulated
		Non-regulated	.	Directly assign to non-regulated
		Common	Remainder of acct	Allocate based on General Allocator
6720/6726	Procurement	Regulated	Analysis of account	Directly assign to regulated
		Non-regulated	Analysis of account	Directly assign to non-regulated
		Common	Remainder of acct	Indirectly assigned based on material usage
6720/6727	Research and Development expense	Regulated	Analysis of account	Directly assign to regulated
		Non-regulated	Analysis of account	Directly assign to non-regulated
		Common	Remainder of acct	Allocate based on General Allocator
6720/6728	Other General and Administrative expense	Regulated	Analysis of accounts	Directly assign to regulated
		Non-regulated	Analysis of accounts	Directly assign to non-regulated
		Common	Remainder of acct	Allocate based on General Allocator