

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of Request for Review by ThedaCare
Physicians-Shawano Clinic of the Decision of the
Universal Services Administration Corporation

Docket No. 02-60

**THEDACARE'S REQUEST FOR REVIEW OF DENIAL FROM THE RURAL HEALTH
CARE DIVISION**

To: Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Room TW-A325
Washington, D.C. 20554

Re: Universal Service Fund Appeal FY 2010
ThedaCare Physicians - Shawano Clinic HCP 18310 FRN 55928

I. INTRODUCTION

ThedaCare Physicians - Shawano Clinic ("Clinic") appeal the decision of the Universal Service Administration Corporation ("USAC") concerning the appropriate level of universal service support for a telecommunication service provided to the clinic by AT&T. The Clinic respectfully request the Federal Communication Commission ("FCC") overturn USAC's decision and provide universal service support as more fully set forth below.

II BACKGROUND

The Clinic had in service a DS-3 with AT&T under a 60mo term agreement which was to end on 6-1-2010. A funding request was made for the period from 7-1-2010 to 5-31-2011.

A second funding request was made for the period 6-1-2011 to 6-30-2011. The June 1st AT&T invoice, the AT&T customer service record for June 2nd, and a letter on June 20th from the AT&T account executive were all used as proof of the rural rate. The letter from the account executive was a key in confirming the rural rate would remain the same after the end of the contract period and at a minimum continue to 6-30-2011.

Form 466 was submitted on June 24th, 2011 with the rural rate information and the appropriate urban rate information. The rural rate was \$3996.14/mo.

After the end of the funding year and upon review of the Funding Commitment Letter verses the AT&T invoice, the price had not remained at \$3996.14 during the period of June 1st - 30th, 2011, but increased to a non contract rate of \$15,920/mo.

In response to an email from our office, the AT&T account executive in an email on 10-25-2011 states, "They came off contract and didn't renew with us. At thought they were going to renew and they didn't. So we billed at the what the tariff allows us to bill."

III ARGUMENT

The FCC should reverse USAC's determination of support in favor of the requested support based on the corrected AT&T invoiced charges, as billed by AT&T and as fully paid by the Clinic.

AT&T did not provide an updated invoice of the corrected charges until after the end of the funding period, June 30th, 2010. At the time the funding request was submitted to USAC on June 24th, the best available information: the June 1st AT&T invoice, the June 2nd AT&T customer service record, and June 20th AT&T account execute letter were included. The information provided by AT&T was the basis of our determination of the rural rate to be entered on our funding commitment form 466.

Only after the end of the funding period, did AT&T provide an invoice which indicated the information provided on the previous invoice, customer service record and account executive were wrong, wrong, and wrong.

Central to USAC's determination to deny the appropriate funding was its mistaken conclusion " because the new rural rate was submitted after the close of the funding year, this appeal is hereby denied."

The purpose of the Funding Commitment Letter (FCL) and the USAC appeal process is to address issues such as this. With the elimination of form 468 and the 466 submission deadline reduced to June 30th of each year; the funding request process streamlining has to be balanced with the real world of carrier billing practices.

Telecommunication and Internet carriers may have significant delays in initial bills, circuit removal changes, and price changes from new contracts. The Health Care Providers ("HCP") rely on the information from the representatives of the carriers and invoices as the basis for funding requests. The financial burden of the acts (or lack) of the carriers should not unfairly fall on the HCP.

IV CONCLUSIONS

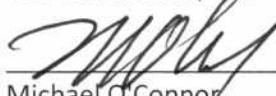
For the reasons as stated above, the FCC should increase the clinics support from \$3370.06 to \$14,632.82. Thank you for your consideration of this matter.

Dated this 2nd Day of July, 2012.

Respectfully submitted,

USF Consultants, Inc.

By:



Michael O'Connor
Consulting Engineer

4409 Monona Drive
PO Box 6641
Monona, WI 53716
(608) 268-2565
email: Micahel@usfnw.com



Universal Service Administrative Company

Rural Health Care Division

Administrator's Decision on Rural Health Care Program Appeal

Via Electronic and Certified Mail

May 3, 2012

Mr. Michael O'Connor
President, USF Consultants
4409 Monona Drive
P.O. Box 6641
Monona, WI 53716

RE: ThedaCare Physicians – Shawano; HCP #18310; Packet #106199; Funding Year 2010
Request for Recalculation of Support

Dear Mr. O'Connor:

The Universal Service Administrative Company (USAC) has completed its evaluation of the letter of appeal, dated November 15, 2011, you submitted on behalf of ThedaCare Physicians - Shawano (ThedaCare or Applicant) for Funding Year 2010 (Appeal). The appeal requests that USAC recalculate funding based on corrected rural and urban rates. Upon review, USAC concludes that the funding was correctly calculated based upon the original request.

Decision on Appeal and Explanation: Denied.

ThedaCare submitted its FCC Form 466 Funding Request and Certification (Form 466) to the Rural Health Care Division (RHCD) on June 26, 2011.¹ Line 33 of the Form 466 asks applicants to state the rural rate of the service; while line 41 of the Form 466 asks applicants to state the urban rate from the RHCD website, or provide a different urban rate with appropriate documentation.² ThedaCare appropriately provided urban and rural rates on the Form 466 and supporting documentation from service provider Wisconsin Bell, Inc. - AT&T Wisconsin (AT&T), and Centurytel Operating Companies.³

RHCD correctly processed ThedaCare's funding request based on the information provided by the Applicant on the Form 466. RHCD issued a funding commitment letter (FCL) showing a 20 percent discount applied to the urban rate.⁴ Because the rural rate

¹ FCC Form 466 submitted by ThedaCare, Packet #106199 (June 26, 2011) (*ThedaCare Form 466*).

² FCC Form 466 at 2 (<http://www.usac.org/rhc/tools/forms/default.aspx>).

³ *ThedaCare Form 466*.

⁴ Letter from USAC RHCD to ThedaCare Physicians - Showano, *Funding Commitment Letter, FRN # 55298* (Sep. 29, 2011) (*ThedaCare FCL*).

had been discounted 20 percent by AT&T⁵ and pursuant to procedure, RHCD applied the same discount to the urban rate.⁶

As stated in your appeal, ThedaCare had been operating under a contract with AT&T for the service in question. The contract expired on June 1, 2011.⁷ ThedaCare submitted Packet #106199 to cover the period from the end of the contract through the end of Funding Year 2010 (June 2, 2011 – June 30, 2011).⁸ A letter from AT&T included in the packet stated the contracted rate for services provided to ThedaCare and that “AT&T will continue to bill service until 6/30/2011.”⁹

Your appeal included email correspondence with AT&T explaining that, because ThedaCare is no longer under contract with AT&T, AT&T recalled the contract rate for the June 2-June 30, 2011 period, and charged the tariff rate.¹⁰

You state in your appeal that AT&T did not honor its commitment to the contracted rate for the June 2 – June 30 period.¹¹ The invoice provided by AT&T to ThedaCare, dated July 7, 2011, showed an increased rate for the service.¹² Your appeal asks that USAC recalculate the support for the June 2 through June 30 period to adjust for the difference between the rural rates for that period and the original contract rate.

After an HCP contracts for service, the HCP must submit to RHCD the FCC Form 466 or Form 466-A, Funding Request and Certification Form, before the close of the funding year.¹³ If there is a rate change during the funding year, an HCP should notify USAC and submit a revised Form 466 before the close of the funding year.¹⁴ Because RHCD correctly processed the application for funding for Packet #106199 using the urban and rural rates provided by you on the FCC Form 466 submitted on June 24, 2011,¹⁵ and because the new rural rate was submitted after the close of the funding year, this appeal is hereby denied.

⁵ *ThedaCare Form 466.*

⁶ *ThedaCare FCL.* See also, 47 C.F.R. § 54.609(a) (“...the amount of universal service support for an eligible service...shall be the difference, if any, between the urban rate and the rural rate charged for the service...”). See also, Form 466 Instructions, 6, Line 33.

⁷ *Letter of Appeal* at 1.

⁸ *ThedaCare Form 466.*

⁹ *Letter from Brian Lodahl, Senior Account Manager, AT&T to Michael O'Connor, USF Consultants (June 20, 2011).*

¹⁰ Email from Brian Lodahl to Michael O'Connor (Oct. 25, 2011, 3:06 p.m.).

¹¹ *Letter of Appeal* at 2.

¹² *Letter of Appeal* at 1, 9.

¹³ *Instructions to the FCC Form 466*, 1 (2008).

¹⁴ *Id.* (“RHCD cannot accept Form 466s for a funding year after the June 30th end of that funding year.”)

¹⁵ *ThedaCare Form 466.*

Mr. Michael O'Connor
May 3, 2012
Page 3 of 3

If you wish to appeal this decision, you may file an appeal pursuant to the requirements of 47 C.F.R. Part 54, Subpart I. Detailed instructions for filing appeals are available at:

www.usac.org/rhc/about/filing-appeals.aspx.

Sincerely,

//s// USAC

cc: Chad Schneider, ThedaCare Physicians - Shawano



Letter of Appeal
Rural Health Care Division of USAC
2000L Street Northwest Suite 200
Washington, D.C. 20036

November 9, 2011

Re: Appeal of Funding associated with FY 2010 HCP 18310 FRN 55928
Shawano Wisconsin to Appleton, WI –ThedaCare DS-3 Service

Dear USAC Review Team,

On behalf of ThedaCare, USF Consultants is requesting an increase in the funding be granted to ThedaCare Physicians – Shawano. We are requesting additional funding associated with the dedicated DS-3 service provided by Wisconsin Bell, Inc – AT&T Wisconsin. Wisconsin Bell, Inc. – AT&T Wisconsin provided misleading information and incorrect documentation which failed to disclose Wisconsin Bell, Inc. – AT&T Wisconsin would increase the price of the service after the end of the discounted service period. The result is the rural rate documentation provided by AT&T used in the determination of the funding was erroneous. USF Consultants has revised rural rate documentation that clearly identifies the costs invoiced to ThedaCare for the DS-3 Service during the funding year is substantially higher.

Back Ground

Wisconsin Bell – AT&T Wisconsin and ThedaCare had signed a 60 month contract in 2006 for a dedicated DS-3 service to be provided from the ThedaCare Shawano-Physicians location to the Appleton Data Center. The service expired on 6-1-2011. On 6-2-2011 the service would be off contract and begin to be billed at the Wisconsin Bell – AT&T tariff rate.

The posting for the location for Funding Year 2011 had an allowable contract date of 6-29-2011 and a new contract could not be signed prior to 6-29-2011. The perfect storm is brewing; the end of the current contract, the end of the funding period, and the 28 day posting period requirements come together. For Funding Year 2010 (FY 2010), 2 funding request and certification forms (packet) are submitted; one for the time under contract and one for the time not under contract.

The packet which USF Consultants submitted for the period 7-1-2010 to 5-31-2011*was completed without issue. The packet from the period from 6-2-2011 to 6-30-2011 has a major funding issue which comes to light after the end of the funding period and after the Funding Commitment Letter is issued. The rural rate charged by Wisconsin Bell – AT&T Wisconsin increased on 6-2-2011 from the discounted contract rate to the tariff rate.

The information available from AT&T: the June 1st invoice(attachment A), the Customer Service Record of 6-2-2011(attachment B), and a signed statement of 6-20-2011 from the AT&T Account Executive assigned to ThedaCare account specifically detail the price of the service will remain until 6-30-2011 at the discounted rate. (attachment C).

Wisconsin Bell Inc. –AT&T Wisconsin increased the rate of the service effective 6-2-2011, as noted from the AT&T invoice of July 1, 2011. (attachment D).

*the end date used on the funding request and certification form (5-31-2011) is based on the 60 month term start date noted on the AT&T Customer Service Record of 6-2-2011

Brian Lodahl, AT&T, email confirming the price increased on 6-2-2011 to the tariff rate.(attachment E)

Funding Request

The original funding request [rural rate/mo]	\$3996.14
The original funding request [urban rate/mo]	\$626.08
Support Granted FRN 55928	\$3370.06

The revised funding request [rural rate/mo]	\$15,920.00
The revised funding request [urban rate/mo]	\$782.60 (attachment F)
Revised Support Requested	\$15.137.40

From 6-2-1011 to 6-30-2011 (29 days) x (\$504.58/day) total support amount \$14,632.82

We are requesting the support amount be adjusted from \$3370.06 to \$14,632.82 to reflect the true cost of the service which was paid by ThedaCare for the service during the time period of 6-2-2011 to 6-30-2011.

Summary

Wisconsin Bell, Inc –AT&T Wisconsin failed to provide the correct billing and support information as required under the Universal Service Fund program rules, which resulted in the under representation of the true monthly cost of the service. The June 1st AT&T invoice, Customer Service Record and signed letter from the AT&T Account Executive all document the rate will not change from the discounted rate from 6-2-2011 to 6-30-2011. The subsequent invoice from AT&T reflects the rate increase on 6-2-2011 and ThedaCare was required to pay the cost of the additional service.

We look forward to your review of our request and should you have any additional questions, please contact me at (608) 268-2565.

Sincerely,



Michael O'Conner
President USF Consultants

Attachments-

Funding Commitment letter
AT&T Invoice 6-1-2011
AT&T CSR 6-2-2011
AT&T Letter
AT&T invoice 7-1-2011
Brian Lodahl e-mail
FY 2010 Urban Rate



Universal Service Administrative Company

30 Lanidex Plaza West
P.O. Box 685
Parsippany, NJ 07054-0685

Rural Health Care Division
www.rhc.universalservice.org
Phone: 1-800-229-5476

September 29, 2011

Michael O'Connor
USF consultants
PO Box 6641,
Monona, WI 53716

Re: Funding Commitment for Funding Year 2010, Packet ID# 106199

Dear Michael O'Connor:

The Rural Health Care division (RHC) of the Universal Service Administrative Company (USAC) has completed a review of your FCC Form 466 or 466-A requesting for support for telecommunications or Internet services.

Based on the information provided on your application(s), the RHC has determined that the rural HCP may receive the one time (non-recurring) and monthly recurring support amounts shown below for Funding Year 2010 (7/1/10 to 6/30/11). The estimated total support amount the RHC has reserved for your request is listed below.

Service: T3 or DS3 - 44736 Kbps
Billing Account Number: 920 Z02-0635 013

Type of Service Agreement	Eligible Support Start Date	Support End Date	Estimated Months of Support	Non-Recurring Support Amount	Monthly Recurring Support Amount	Estimated Total Support Amount	Funding Request Number
Month to Month	06/01/2011	06/30/2011	1	\$0.00	\$3,370.06	\$3,370.06	55928

We have sent this letter to both the rural Health Care Provider (HCP) mailing address above and the rural HCP physical location below (if these addresses are different).

HCP Number: 18310
HCP Contact Name: Chad Schneider
HCP Name: ThedaCare Physicians - Shawano
HCP Address: 100 County Road B
Shawano, WI 54166

In addition, a copy of this letter has been sent to your service provider listed below.

Service Provider Name: Wisconsin Bell, Inc. - AT&T Wisconsin
Service Provider Identification Number (SPIN): 143001856



THEDA CARE
 PHYSICIANS - SHAWANO
 CO WISICOM-DEPT J790
 PO BOX 259660
 MADISON, WI 53725-9660

Page 1 of 1
 Account Number 920 202-0635 013 7
 Billing Date Jun 1, 2011
 Web Site att.com

Invoice Number 920Z02063506

Monthly Statement

May 2 - Jun 1, 2011

Bill-At-A-Glance	
Previous Bill	4,001.14
Payment Received 5-16: Thank You!	4,001.14CR
Adjustments	.00
Balance	.00
Current Charges	3,996.14
Total Amount Due	\$3,996.14
Amount Due in Full by	Jun 23, 2011

Billing Summary	
Billing Questions? Visit att.com/billing	
Plans and Services 1-800-480-8088	3,996.14
Repair Service: 1-800-727-2273	
Total of Current Charges	3,996.14

Plans and Services	
Monthly Service - Jan 1 thru Jun 30 PremierSERV™	3,996.14
Total Plans and Services	3,996.14

News You Can Use

PREVENT DISCONNECT
 Thank you for being a valued customer. It is important to inform you that all charges must be paid each month to keep your account current and prevent collection activities. In addition, please be aware that we are required to inform you of certain charges that MUST be paid in order to prevent interruption of basic local service. These charges are already included in the Total Amount Due and are \$3,996.14.

CALL BEFORE YOU DIG!
 Always call 811 before you begin an excavation project so all utilities can be identified and marked. Dig with care. Damages are avoided when safe digging procedures are followed. CALL 811 BEFORE YOU DIG!

SPECIAL OLYMPICS
 Support Special Olympics today! Text the word "UNITY" to 80888 to donate \$5. A one-time donation of \$5 will be billed to your mobile phone bill. Messages sent to or from 80888 are free for AT&T customers. Donations are collected for Special Olympics by MobileCause.com. Reply SFOP to 80888 to stop your donation. Reply HELP to 80888 for help. For terms, go to www.igfn.org/t.

News You Can Use Summary

- PREVENT DISCONNECT
- SPECIAL OLYMPICS

• CALL BEFORE YOU DIG!
 See "News You Can Use" for additional information.

Local Services provided by AT&T Illinois, AT&T Indiana, AT&T Michigan, AT&T Ohio or AT&T Wisconsin based upon the service address location.
 GO GREEN - Enroll in paperless billing.

Return bottom portion with your check in the enclosed envelope.

att.com

DUE BY: Jun 23, 2011 \$3,996.14 **LATE: After Jun 23, 2011 \$4,056.08**



Billing Date Jun 1, 2011

Account Number **920 202-0635 013 7**
 Please include your account number on your check.

THEDA CARE
 PHYSICIANS - SHAWANO
 CO WISICOM-DEPT J790
 PO BOX 259660
 MADISON, WI 53725-9660

Make Checks Payable to:
 AT&T
 PO BOX 8100
 AURORA, IL 60507-8100



792036020063501388174002002100 00 0000 00003996140000405608

Attachment A

CUSTOMER SERVICE RECORD

06/02/11 ZBU EB000A02
 PRINTED 060111 NONE MZB 013 920 Z02-0635 1
 BILLDT EXCH CS CUST TELNUM PAGE

BL	CODE &		UNIT		TAX
GRP	QNTY	DESCRIPTION	RATE	TOTAL	FSCMXT
ZBU	EB, 000-A02				
ZCPI	I				
NOCN	9327				
	--MAIN LISTINGS				
NP	(SPNP) THEDACARE; INC				
LA	1818 N MEADE, APPLETON				
SIC	9999				
	--BILLING INFORMATION				
BN1	THEDA CARE				
BN2	PHYSICIANS - SHAWANO				
BN3	CO VISICOM-DEPT J790				
BA1	PO BOX 259660				
PO	MADISON WI 53725-9660				
ZGC	500000000				
SS	NONE				
TAR	NONE				
TAX	C, E				
ZCPI	I, O, RD CONVERSION, 03-27-2010				
CBID	AC0000005FW9				
	--SERVICE AND EQUIPMENT				
	--LEFT HAND FIDS				
SPP	(A)VT7/SCS XJH3N/CNUM 20060224-0328 /TA 60, 06-01-06/SED 02-16-06				
	--SPECIAL SERVICES CIRCUITS				
CLS	.HIDC.479515.WT/SCS XJH3N/NC HF-- /ORD N1301589013/CD 06-01-06				
37	1YZX3 /SCS XJH3N/SPP (A) /ORD N1301589013/CD 06-01-06	63.50	2349.50	NEENNN	
2	CZ4X3 /SCS XJH3N/SPP (A) /ORD N1301589013/CD 06-01-06	281.82	563.64	NEENNN	
CKL	1-1818 N MEADE, APPLETON, WI /SCS XJH3N/SN THEDACARE INC /LSO 920 731 /CFA 02D24 OC12 12 APPLWI01 APPLWIASH05/SAG 920 APPL 73X /XPOI APPLWIASH05/NCI 04DS6.44 /ORD N1301589013/CD 06-01-06				
1	CTG /SCS XJH3N/ORD N1301589013 /CD 06-01-06	0.00	0.00	NEENNN	
	CKL 1 SUBTOTAL		0.00		
CKLT	2-APPLWI01/SCS XJH3N/ORD N1301589013 /CD 06-01-06				

Messic Part

Attachment B

CUSTOMER SERVICE RECORD

06/02/11 060111 NONE MZB 013 920 Z02-0635 2
 PRINTED BILLDT EXCH CS CUST TELNUM PAGE

BL	CODE & GRP	QNTY	DESCRIPTION	UNIT RATE	TOTAL	TAX FSCMXT
			CKL 2 SUBTOTAL		0.00	
	CKL		3-100 COUNTY HIGHWAY B, SHAWANO, WI/SCS XJH3N /SN THEDACARE PHYSICIANS /LSO 715 526/XPOI SHWNWIXA /NCI 04DS6.44/ICO LKSH /ORD N1301589013/CD 06-01-06			
1	TZUP3		/SCS XJH3N/SPP (A) /ORD N1301589013/CD 06-01-06	1083.00	1083.00	NEENN
			CKL 3 SUBTOTAL		1083.00	
			CIRCUIT TOTAL		3996.14	
			SPECIAL SERVICES CIRCUITS TOTAL		3996.14	
			TOTAL EXCLUDING TAXES		3996.14	

ICT

- SERV & EQUIP ACCOUNT SUMMARY
- 1 CTG Circuit Termination No Chg
 - 2 CZ4X3 Channel Mileage Termination
 - 1 TZUP3 Local Distribution Channel
 - 37 1YZX3 Channel Mileage

--CIRCUIT SUMMARY

BG	CIRCUIT	ACCOUNT
CLS	.HIDC.479515..WT	920 Z02-0635 013

Attach met B





Michael O'Connor
USF Consultants
PO Box 6641
Monona, WI 53716

June 20, 2011
Re ThedaCare DS-3 Services Billing Confirmation

Dear Michael,

This letter is to assist you in completing your federal funding requests.

- DS-3 ThedaCare Shawano Clinic to Appleton CO
(920) 202 0635 Under a 60 mo discount rate ended on 5/31/2011 and AT&T will continue to bill for the service until 6/30/2011
Month cost \$3996.14

Please advise if you have additional questions.

Brian L. Lodahl

Senior Account Manager

Attachment C

Michael O'Connor

From: LODAHL, BRIAN [bl8178@att.com]
Sent: Tuesday, October 25, 2011 3:06 PM
To: Michael@usfnw.com
Subject: Re: USF Consultants Theda Care billing correction needed

Mike

They came off of contract and didnt renew with us. Attthought they were going to renew and they didn't. So we billed at what tarrifallows us to bill.

Sent from my Motorola ATRIX™ 4G on AT&T

-----Original message-----

From: Michael O'Connor <Michael@usfnw.com>
To: "LODAHL, BRIAN" <bl8178@att.com>
Cc: "Chad Schneider (IT)" <chad.m.schneider@thedacare.org>
Sent: Tue, Oct 25, 2011 19:19:48 GMT+00:00
Subject: USF Consultants Theda Care billing correction needed

Brian,

The DS-3 from Appleton to Shawano increased in price on June 2nd. I have attached your letter of June 20th 2011 indicates you would hold the discounted rate until 6-30-2011. The rate increased from \$3,996.14/mo to \$11,924/mo. The net increase in price was \$11,526.40 for the 29 days of service.

Please correct the account by placing a credit of \$11,526.40 on the account as soon as possible.

If you have any questions please advise.

Mike

Michael O'Connor
USF Consultants
PO Box 6641
Monona, WI 53716
(608)268-2567 Voice
(608)268-2566 Fax

Attachment E

ACCESS SERVICE

18. RATES AND CHARGES – CENTURYTEL OF WISCONSIN, LLC, CENTURYTEL OF CENTRAL WISCONSIN, LLC, TELEPHONE USA OF WISCONSIN, LLC, SPECTRA COMMUNICATIONS GROUP, LLC (Cont'd)

18.3 Special Access Service (Cont'd)

18.3.7 High Capacity Service

Regulations concerning High Capacity Service are set forth in Section 7.9 preceding.

(A) Channel Termination Per Termination	Monthly Rate	Nonrecurring Charge	(I)
- DS1 - 1.544 Mbps	\$68.06	\$237.15	
- DS1C - 3.152 Mbps	ICB	ICB	
- DS2 - 6.312 Mbps	ICB	ICB	
- DS3 - 44.736 Mbps	\$782.60	\$518.25	

DS-1/DS-3

Shawano
 782.60
 Appleton

A 782.50
 7CT

Month to Month	2 year	5 year
\$68.01	782.50 x 20%	\$54.45
\$68.01	156.52	\$54.45
\$126	156.52	\$108.90
	526.08	

<https://interapp.centurytel.com/resources/pdf/applications/tariffs/interstate/ctoc1.pdf>

as of 9-10-2010

D)
 D)

(This page filed under Transmittal No. 69)

Issued: June 16, 2009

Director, Tariffs & Compliance
 PO Box 4065, Monroe, LA 71211

Effective: July 1, 2009

CONFIDENTIAL

7-1-10
 Attachment F