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September 27, 2012

**By Hand Delivery**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW  
Washington, DC 20554

**Re: WC Docket No. 12-233  
WCB/Pricing No. 12-09  
Direct Case of Skyline Telephone Membership Corporation**

Dear Ms. Dortch:

John Staurulakis, Inc. hereby files the attached Direct Case on behalf of Skyline Telephone Membership Corporation pursuant to the Commission's *Order Designating Issues for Investigation*, DA 12-1430, released August 31, 2012 in the above-referenced docket. The Direct Case is filed as confidential under the Commission's Protective Order.<sup>1</sup> Pursuant to the Protective Order, provided are one copy of the confidential version and two copies of the redacted version. The redacted version has also been filed on the Electronic Comment Filing System.

Please direct any questions regarding this filing to the undersigned.

Sincerely,

John Kuykendall  
Vice President  
301-459-7590  
[jkuykendall@jsitel.com](mailto:jkuykendall@jsitel.com)

Attachment

cc: Robin Cohn, Pricing Policy Division, via email.

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<sup>1</sup> See *In the Matter of Investigation of Certain 2012 Annual Access Tariffs*, WC Docket No. 12-233, WCB/Pricing File No. 12-09, Protective Order, DA 12-1518, rel. Sept. 21, 2012.

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

In the Matter of )  
 ) WC Docket No. 12-233  
Investigation of Certain 2012 Annual )  
Access Tariffs ) WCB/Pricing No. 12-09  
 )

**DIRECT CASE OF  
SKYLINE TELEPHONE MEMBERSHIP CORPORATION**

Skyline Telephone Membership Corporation, (“Skyline”) pursuant to the August 31, 2012 Designation Order,<sup>1</sup> hereby files its Direct Case in the above-referenced matter.

**I. INTRODUCTION**

On June 18, 2012, Skyline Telephone Membership Corporation, (alternatively “Skyline” or “Company”), through its consultant John Staurulakis, Inc. (“JSI”) filed under Transmittal No. 165 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 (“JSI Tariff”) revisions in accordance with the Commission’s March 28, 2012 release entitled In the Matter of July 3, 2012 Annual Access Charge Tariff Filings, WCB/Pricing File No. 12-07, Order, DA 12-482 (“June 18<sup>th</sup> filing”). Skyline is an Issuing Carrier of the JSI Tariff.

Skyline elected to file an Access Recovery Charge (“ARC”) pursuant to Section 1.917(e), to be effective July 3, 2012, and a Connect America Fund (“CAF”) election pursuant to Section 51.917(f). The Company made the appropriate filing on June 18, 2012. On July 2, 2012, the Wireline Competition Bureau released an Order that suspended for one day and set for investigation the ARC rates contained in the 2012 Annual Access Tariff filings of all issuing incumbent local exchange carriers (“ILECs”)

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<sup>1</sup> Investigation of Certain 2012 Annual Access Tariffs, WC Docket No. 12-233, WCB/Pricing No. 12-09, *Order Designating Issues for Investigation*, DA 12-1430 (rel. August 31, 2012) (“Designation Order”).

that charged an ARC, including those filed on behalf of Skyline. Pursuant to the *Designation Order*, Skyline hereby submits the required information and demonstrates that in light of the adjustments discussed in this Direct Case, Skyline’s ARC rates are just and reasonable.

The financial information presented in this Direct Case as Exhibit 1, the 2012 ROR ILEC Interstate Rates Worksheet and the 2012 ROR ILEC Intrastate Rates Worksheet,<sup>2</sup> is confidential and is being submitted with this Direct Case in both confidential and redacted versions. This revised financial information will also be filed with USAC as directed by the *Designation Order*.

Skyline is also filing the appropriate certifications with this Direct Case indicating that this filing is true and correct to the best of its knowledge, that it was not seeking duplicative recovery, and that it complied with sections 51.917(d), 51.917(e), and 51.917(f) of the Commission’s rules.<sup>3</sup> These certifications are being filed in support of the revised Tariff Review Plan information being filed with the Commission in conjunction with this Direct Case.

## **II. ISSUES DESIGNATED FOR INVESTIGATION**

### **A. Whether LEC has Reasonably Determined the Amount of its Base Period Revenue**

#### **1. Fiscal Year 2011 Revenue Determination**

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<sup>2</sup> Also referred to as the Tariff Review Plan or financial information.

<sup>3</sup> See 47 C.F.R. §§ 1.16 (addressing unsworn declarations under penalty of perjury in lieu of affidavits); 51.917(d)(1)(vii) (requiring annual certification from Rate-of-Return carriers obtaining Eligible Recovery that no duplicative recovery is sought); and 51.917(f)(3) (stating that “A Rate-of-Return carrier that elects to receive CAF ICC support must certify with its 2012 annual access tariff filing and on April 1<sup>st</sup> of each subsequent year that it has complied with paragraphs (d) and (e), and, after doing so, is eligible to receive the CAF ICC support requested pursuant to paragraph (f) of this section”).

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A rate-of-return Local Exchange Carrier's ("LEC's") Base Period revenue is made up of three components: 1) its 2011 Interstate Switched Access Revenue Requirement; 2) Fiscal Year 2011 revenues from rate elements included in the definition of Transitional Intrastate Access Service received by March 31, 2012; and 3) Fiscal Year 2011 reciprocal compensation revenues received by March 31, 2012, less Fiscal Year 2011 reciprocal compensation payments made by March 31, 2012 (net reciprocal compensation revenues). Base Period Revenue also includes revenues from non-recurring charges associated with the switched access services in question.

Skyline bills its carrier access bills ("CABs") on a mid-month cycle. Consequently, intrastate terminating billing usage reflected in the June 18<sup>th</sup> filing for Skyline was based on the time period from August 21, 2010 through August 20, 2011 and not the October 1, 2010 through September 30, 2011 Fiscal Year put forth by the Commission. The CABs are used to ensure that the revenues are for services provided during Fiscal Year 2011, eliminate billed revenues not related to services provided such as late fees which are identified separately on the CABs and to make certain that billed revenues were collected by March 31, 2012.

Please reference Exhibit 1 which reflects the intrastate terminating billing usage "calendarized" to align with the October 2010 through September 2011 Fiscal Year. Skyline relied on its CABs to recast this information. Ultimately, the calendarized information did not cause a change in the ARC rates established by Skyline in the June 18<sup>th</sup> filing.

**2. Non-recurring charges inclusions and eliminations**

Skyline does not have any non-recurring charges associated with the services in question. As a result, Base Period Revenue is not impacted by non-recurring charges. Non-recurring charges not related to these services were also excluded from the billed revenues used in the June 18<sup>th</sup> filing and in this Direct Case.

**B. Whether LEC has Reasonably Calculated its Required Intrastate Rate Reductions**

Skyline has followed the appropriate procedure when determining its required intrastate rate reductions for the purposes of the June 18<sup>th</sup> filing, and for this Direct Case, and is not subject to review of this issue as outlined in the Commission's *Designation Order*.

**C. Whether LEC has Reasonably Estimated its Projected Interstate and Intrastate Switched Access Demand**

LECs were directed to use existing demand estimation methods to project demand for the 2012-2013 tariff period. In calculating the Eligible Recovery, a LEC must also subtract certain projected intrastate and interstate access revenues from its Base Period.

Please reference Exhibit 1. As indicated on the 2012 ROR ILEC Interstate Rates Worksheet, the LSS amount reflected in cell F-7 is [REDACTED] and the projected annual percentage rate of demand change reflected in the calculation of the amount in cell F-10 is -14.25%. As indicated on the 2012 ROR ILEC Intrastate Rates Worksheet, the projected annual percentage rate of demand change reflected in the calculation of the amount in cell G-9 is -10.63%.

This review indicates that Skyline’s projected interstate and/or intrastate demand loss is less than an annualized rate of fifteen percent. Accordingly, Skyline falls within the “safe harbor” of fifteen percent and no further action is warranted.

**D. Whether NECA’s Allocation of Projected Pool Interstate Switched Access Revenues Based on Projected Switched Access Billed Revenues was Reasonable**

Not applicable to Skyline Telephone Membership Corporation.

**E. Whether the Suspended Access Recovery Charge Rates are Just and Reasonable and, if not, the Process for Requiring Refunds**

Please reference Exhibit 2 which is a Table reflecting Skyline’s filed ARC rates and the ARC rates supported by this Direct Case. In this Direct Case, Skyline reaffirms the ARC rates that were established in the June 18<sup>th</sup> filing and asserts that the ARC rates established in the June 18<sup>th</sup> filing were just and reasonable. Skyline is also filing Exhibit 3 with this Direct Case, which is the completed Tariff Review Plan showing the calculation of its ARC rates. In light of the fact that no changes are being proposed to the ARC rates calculations, this Tariff Review Plan will not be re-filed and Skyline will not be filing revised ARC rates with the Commission in conjunction with this Direct Case.

**III. CONCLUSION**

Skyline presents this Direct Case in compliance with the aforementioned August 31, 2012 *Designation Order*. Skyline has reasonably determined the amount of its Base

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Period Revenue, reasonably calculated its required intrastate rate reductions, and reasonably estimated it projected interstate and intrastate switched access demand.

Accordingly, and in light of the adjustments described in this Direct Case, Skyline's suspended ARC rates are just and reasonable and are reaffirmed by this Direct Case.

Respectfully submitted,

September 27, 2012

**Skyline Telephone Membership Corporation**

/s/ Jimmy C. Blevins

Jimmy C. Blevins

CEO

1200 NC Highway 194 North

P.O. Box 759

West Jefferson, NC 28694-0759

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## EXHIBIT 1

- 2012 ROR ILEC Interstate Rates Worksheet
- 2012 ROR ILEC Intrastate Rates Worksheet

	A	B	C	D	E	F	G	H	
1	Filing Date: June 18, 2012								
2	Filing Entity: Skyline Telephone Membership Corporation								
3	Transmittal Number:								
4	COSA: 230501								
5									
6									
7	Most Recently Filed Interstate Switched Access Revenue Requirement					Input			
8	TY 2012-2013 Baseline Adjustment Factor (BAF)						0.95		
9	BAF X Most Recently Filed Interstate Switched Access Revenue Requirement					F7*F8			
10	Total TY 2012-2013 Expected Maximum Interstate Revenue					Sum of Col. H			
11	TY 2012-2013 Interstate Eligible Recovery					F9-F10			
12									
13									
14	Interstate Tariff Section	USOC	Interstate Switched Access Rate Element	Unit of Demand (e.g., MOU or DS1)	12/29/11 Interstate Rate	7/1/2012 Proposed Rate			
15	Input	Input	Input (Note 1)	Input	Input	Input			
16	<b>** LOCAL SWITCHING **</b>								
17	17.2.3	LS	Local Switching	MOU	0.0112	0.0112			
18									
19									
20									
21									
22	<b>** INFORMATION **</b>								
23	17.2.3	INFO	Information	MOU	0.016361	0.016361			
24									
25									
26									
27									
28	<b>** TANDEM-SWITCHED TRANSPORT AND TANDEM **</b>								
29	17.2.2	TSF	Tandem Switched Facility	MOU per Mile	0.000353	0.000353			
30	17.2.2	TST	Tandem Switched Termination	MOU per Term	0.001739	0.001739			
31									
32									
33									
34	<b>** SIGNALING FOR TANDEM SWITCHING **</b>								
35	17.2.2	TS	Tandem Switching	MOU	0	0			
36									
37									
38									
39									
40	<b>** DIRECT-TRUNKED TRANSPORT **</b>								
41	17.2.2	DTF	Direct Trunk Transport Facility	DS1's per Mile	16.6	16.6			
42	17.2.2	DTF	Direct Trunk Transport Facility	DS3's per Mile	114.23	114.23			
43	17.2.2	DTT	Direct Trunk Transport Termination	DS1's per Term	81.82	81.82			
44	17.2.2	DTT	Direct Trunk Transport Termination	DS3's per Term	455.71	455.71			
45									
46	<b>** DEDICATED SIGNALING TRANSPORT **</b>								
47									
48									
49									
50									
51									
52	<b>** ENTRANCE FACILITIES **</b>								
53	17.2.2	EF	Entrance Facilities	DS1's	153.3	153.3			
54									
55									
56									
57									
58	<b>** LINE INFORMATION DATABASE **</b>								
59	17.2.2	DBQ	800 Database Query-Basic	Queries	0.0054	0.0054			
60	17.2.2	DBQ-V	800 Database Query - Vertical	Queries	0.0061	0.0061			
61									
62									
63									
64	<b>** BILLING NAME AND ADDRESS **</b>								
65									
66									
67									
68									
69									
70									
71	Total TY 2012-2013 Expected Maximum Interstate Revenue (Sum of Col. H)								
72									
73									
74	Note 1: Enter one rate element per line under the relevant category. Insert rows as necessary.								

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S
1	Filing Date: June 18, 2012																		
2	Filing Entity: Skyline Telephone Membership Corporation																		
3	Transmittal Number:																		
4	COSA: 230501																		
5																			
6																			
7	Total FY 2011 Actual Revenue for Transitional Intrastate Access Service Rate Elements														Sum of Col. O				
8	95% of Total FY 2011 Actual Revenue for Transitional Intrastate Access Service Rate Elements														Sum of Col. P				
9	Total TY 2012-2013 Expected Maximum Transitional Intrastate Access Service Revenue														Sum of Col. R				
10	Total TY 2012-2013 Intrastate Eligible Recovery														Sum of Col. S				
11																			
12																			
13	Intrastate Tariff Section	Interstate Tariff Section	USOC	Intrastate and Interstate Switched Access Rate Elements for Transitional Intrastate Access Service Categories	Unit of Demand (e.g., MOU or DS1)	12/29/2011 Intrastate Rate	12/29/2011 Interstate Rate	FY 2011 Intrastate Units: Terminating for Non- Dedicated or Originating and Terminating for Dedicated Elements											
14	Input	Input	Input	Input (Note 1)	Input	Input	Input	Input											
15	** TERMINATING END OFFICE ACCESS SERVICE **																		
16																			
17				Terminating Carrier Common Line - NC	MOU	0.0433	0	19,547,937											
18				Terminating Carrier Common Line - TN	MOU	0.006892	0	199,516											
19																			
20																			
21																			
22	<u>Terminating Local Switching</u>																		
23				Terminating Local Switching-NC	MOU	0.00900	0.0112	19,547,937											
24				Terminating Local Switching -TN	MOU	0.007404	0.0112	199,516											
25																			
26																			
27																			
28	<u>Terminating Other (e.g., information surcharge, Transport or Residual Interconnection Charges)</u>																		
29				Info Surcharge - NC	100 MOU	0	0.000164	228,824											
30				Info Surcharge - TN		0	0.000164	1,995											
31				Line Termination -NC		0.007	0	19,547,937											
32				Intercept - NC		0.0000850	0	19,547,937											
33				ACS	MOU	0.0182645	0.014583802	3,235,277											
34				DRP	MOU	0.0617142	0.014583802	62,158											
35	** TERMINATING TANDEM-SWITCHED TRANSPORT ACCESS SERVICE **																		
36	<u>Terminating Tandem-Switched Common Transport</u>																		
37				Local Transport Facility - NC	MOU x Miles	0.000423	0.000353	103,106,771											
38				Local Transport Termination - NC	MOU x Terms	0.0084	0.001739	19,547,937											
39				Local Transport Facility - TN	MOU x Miles	0.000071	0.000353	391,057											
40				Local Transport Termination -TN	MOU x Terms	0.0002	0.001739	199,528											
41																			
42	<u>Terminating Tandem Switching</u>																		
43																			
44																			
45																			
46																			
47																			
48	** ORIGINATING AND TERMINATING DEDICATED TRANSPORT ACCESS SERVICE **																		
49	<u>Originating and Terminating Entrance Facilities</u>																		
50																			
51																			
52																			
53																			
54																			
55	<u>Originating and Terminating Tandem-Switched Dedicated Transport</u>																		
56																			
57																			
58																			
59																			
60																			
61	<u>Originating and Terminating Direct-Trunked Transport</u>																		
62																			
63	<u>Direct Trunks</u>																		
64																			
65																			
66																			
67																			
68	Total																		
69																			
70																			
71	Note 1: Enter one rate element per line under the relevant category. Insert rows as necessary.																		

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## EXHIBIT 2

Initial ARC Rate and Direct Case ARC Rate

Comparison Table

**SKYLINE TELEPHONE MEMBERSHIP CORPORATION**

**Exhibit 2**

**Initial ARC Rate and Direct Case ARC Rate Comparison Table**

	<b>Initial ARC Rate</b>	<b>Direct Case ARC Rate</b>
<b>Primary Residential or Single Line Business End User Common Line Charge</b>	<b>\$0.50</b>	<b>\$0.50</b>
<b>Multi-Line Business End User Common Line Charge</b>	<b>\$1.00</b>	<b>\$1.00</b>

**Excludes Lifeline Customers**

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# EXHIBIT 3

Tariff Review Plan

Calculation of ARC Rates

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Filing Date (enter w/leading '):  
 Holding Company:  
 Filing Name:

6/18/2012

Skyline Telephone Membership Corporation

ARCRTRP-CAF-1

Study Area EXCHANGES

Rate Ceiling Component Charges Calculation ( 51.915(b)(11) )

RESIDENCE / NP / BRI / SLB (excluding Lifeline)

MULTI-LINE BUSINESS

Study Area	EXCHANGES	Mandatory								Total Rate Ceiling Comp. Chgs	Federal SLC-MLB
		Stand-alone R1 rate	Mandatory EAS	Zone Charges	State SLC	E911	TRS	State USF	Federal SLC		
230501 NC Exchanges - Standard		\$ 12.00	\$ -	\$ -	\$ -	\$0.60	\$0.11	\$0.00	\$6.50	\$19.21	\$ 9.20
230501 NC Exchanges - E Line		\$ 2.00	\$ -	\$ -	\$ -	\$0.60	\$0.11	\$0.00	\$6.50	\$9.21	\$ 9.20
230501 TN Exchanges - Standard		\$ 12.00	\$ -	\$ -	\$ -	\$1.50		\$0.00	\$6.50	\$20.00	\$ 9.20
230501 TN Exchanges - E Line		\$ 2.00	\$ -	\$ -	\$ -	\$1.50		\$0.00	\$6.50	\$10.00	\$ 9.20

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Filing Date (enter w/leading '): 6/18/2012  
 Holding Company: Skyline Telephone Membership Corporation  
 Filing Name:

ARCRCTRP-CAF-2

Eligible Revenue - Current Yr Recovery		Eligible Revenue - Current Yr Recovery	
Maximum Imputed ARC Revenue		Tariffed ARC Revenue + Expected CAF ICC Support	
Tariffed ARC Revenue			
Expected CAF ICC Support	\$ 1,548,794		

Residential Rate Ceiling: ( 51.915(b)(12) )	\$	30.00
Maximum MLB SLC+ARC ( 51.915(e)(5)(iv) )	\$	12.20
Max ARC for current year: Res/SLB	\$	0.50
Max ARC for current year: MLB	\$	1.00

Totals

Exchange/RG

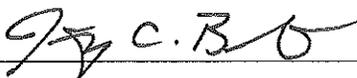
RESIDENCE / NP / BRI / SLB (excluding Lifeline)

MULTI-LINE BUSINESS

	RESIDENCE / NP / BRI / SLB (excluding Lifeline)				MULTI-LINE BUSINESS			
	Residential	RES/NP/BRI Current Year		SLB	MLB	MLB Curr. Yr.	NonCentrex	Centrex
	Total Rate Ceiling Chgs	Maximum ARC Rate	Tariffed ARC Rate	Tariffed ARC Rate	Federal SLC	Maximum ARC Rate	Tariffed ARC Rate	Tariffed ARC Rate
NC Exchanges - Standard	\$ 19.21	\$ 0.50	\$ 0.50	\$ 0.50	\$ 9.20	\$ 1.00	\$ 1.00	\$ 1.00
NC Exchanges - E Line	\$ 9.21	\$ 0.50	\$ 0.50	\$ 0.50	\$ 9.20	\$ 1.00	\$ 1.00	\$ 1.00
TN Exchanges - Standard	\$ 20.00	\$ 0.50	\$ 0.50	\$ 0.50	\$ 9.20	\$ 1.00	\$ 1.00	\$ 1.00
TN Exchanges - E Line	\$ 10.00	\$ 0.50	\$ 0.50	\$ 0.50	\$ 9.20	\$ 1.00	\$ 1.00	\$ 1.00

**Certification of Officer for Rate-of-Return Carrier Not Seeking Duplicative Recovery**

**I certify that I am an officer of the reporting carrier and that, to the best of my knowledge, the reporting carrier is not seeking duplicative recovery in the state jurisdiction for any Eligible Recovery subject to the recovery mechanism as per §51.917(d)(vii).**

Name of Reporting Carrier	SkyLine Telephone Membership Corporation		
Signature of Authorized Officer		Date	9/21/2012
Printed name of Authorized Officer	Jimmy C. Blevins		
Title or position of Authorized Officer	Chief Executive Officer		
Telephone number or Authorized Officer.	(336) 877-1350 ext. 6145		
Study Area Code of Reporting Carrier	230501	Filing Due Date for this form (mm/dd/yyyy)	09/27/2012

Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

**Certification of Officer for Rate-of-Return Carrier Eligibility for CAF/ICC Recovery**

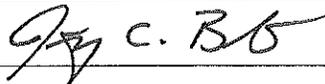
**I certify that I am an officer of the reporting carrier and that, to the best of my knowledge, the reporting carrier on this form certifies that it has complied with Eligible Recovery §51.917(d) and Access Recovery Charge §51.917(e) and is eligible to receive the CAF ICC support requested pursuant to §51.917(f).**

Name of Reporting Carrier	SkyLine Telephone Membership Corporation		
Signature of Authorized Officer		Date	9/21/2012
Printed name of Authorized Officer	Jimmy C. Blevins		
Title or position of Authorized Officer	Chief Executive Officer		
Telephone number or Authorized Officer.	(336) 877-1350 ext. 6145		
Study Area Code of Reporting Carrier	230501	Filing Due Date for this form (mm/dd/yyyy)	09/27/2012

Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

**Certification of Officer as to the Accuracy of the CAF ICC Data Reported**

**I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the actual data reported; and, to the best of my knowledge, the information reported on this form is accurate.**

Name of Reporting Carrier		SkyLine Telephone Membership Corporation	
Signature of Authorized Officer			Date 9/21/2012
Printed name of Authorized Officer		Jimmy C. Blevins	
Title or position of Authorized Officer		Chief Executive Officer	
Telephone number of Authorized Officer.		(336) 877-1350 ext 6145	
Study Area Code of Reporting Carrier	230501	Filing Due Date for this form (mm/dd/yyyy)	09/27/2012

Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

**Certification of Officer  
to Authorize an Agent to File Data on Behalf of Reporting Carrier**

**I certify that (Name of Agent) John Staurulakis, Inc. (JSI) is authorized to submit information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the data provided to the Authorized Agent; and, to the best of my knowledge, the actual data provided to the Authorized Agent are accurate.**

Name of Authorized Agent                      John Staurulakis, Inc. (JSI)

Name of Reporting Carrier                      SkyLine Telephone Membership Corporation

Signature of Authorized Officer                                            Date                      9/21/2012

Printed name of Authorized Officer                      Jimmy C. Blevins

Title or position of Authorized Officer                      Chief Executive Officer

Telephone number of Authorized Officer.                      (336) 877-1350 ext 6145

Study Area Code of Reporting Carrier	230501	Filing Due Date for this form (mm/dd/yyyy)	09/27/2012
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Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.