

PSMCC consists of a six-bed acute care facility and a 43-bed long term care facility. Its services include emergency, inpatient hospital care, laboratory, radiology, rehabilitation, respiratory therapy, family care clinic, home health care, and long term care.

The facility is owned by the city of Seward, and managed by Providence Health & Services. Providence Health and Services (PHS) is a not-for-profit network of hospitals, care centers, health plans, physicians, clinics, home health services, affiliated services and educational facilities that span five states, including Alaska. One of the PHS facilities is the Providence Alaska Medical Center (PAMC), which is located in Anchorage and is Alaska's largest hospital. As a PHS managed facility, PSMCC has access to many of PAMC's services, including the services of radiologists and pathologists who interpret the imaging and lab services that are provided at PSMCC, and the Electronic Medical Record (EMR) data center.

All of PSMCC telecommunication circuits (T-1) circuits connect back to PAMC and are used primarily for transmitting digital imaging (PACS, CT, X-ray), biomedical resources (drug libraries, instruction or information on pumps, etc.), facility operations, and Electronic Medical Records (EMR).

The use of and tie-in to PAMC's EMR plays an important role in the delivery of health care in the small rural community of Seward. It provides a single repository for all patient information and can be accessed across the continuum of care (e.g., PAMC, and physician offices). For the vast majority of heart attack, stroke, and traumatic injury patients on the eastern side of the Kenai Peninsula, PSMCC is the only place where they are stabilized and given initial treatment before being transferred to a tertiary care center, which is often PAMC. Electronic medical records facilitate the emergency room treatment and transfer of these patients and contribute to high quality emergency and trauma care equivalent to that available in Anchorage, Alaska's largest urban center.

For many years, PSMCC relied on two T-1 land circuits supplied by carrier GCI that traveled from Seward to Anchorage through the Chugach Mountain Range. These circuits traverse through several mountain passes that are subject to avalanches, high wind, and other adverse climatic conditions that have subjected the circuits to outages during winter months, which in Alaska are particularly lengthy and which have impacted patient care and safety at PSMCC. In addition, the single roadway connection between Seward and Anchorage is subject to being periodically closed for between several hours and several days several different times each winter due to avalanches that block the roadway.

This reality combined with stretches in the winter when small plane travel in and out of Seward becomes impossible as a result of prolonged adverse weather conditions results in periodic instances when seriously injured or seriously ill patients cannot be medivaced to Anchorage necessitating periodic interim intensive care at PSMCC, during which absolutely reliable communications can make the difference between life and death.

Over the past three years, PSMCC's reliance on PAMC and its staff of advanced practitioners for the operation of its clinic, emergency department, and radiology and lab services has grown significantly. This growth, along with implementation of the EMR database has increased the need for uninterrupted connectivity with PAMC.

In the spring of 2009, PSMCC explored available telecommunication options that could provide PSMCC's circuits with increased bandwidth, redundancy and diversity to maintain PSMCC's operations without interruption in connectivity. It was determined that the only option¹ available that could provide geographic and carrier diversity and redundancy was a submarine fiber optic circuit, already then in existence, that traverses from Seward to Kodiak Island and from Kodiak Island to Anchorage. See Ex. 3 – map of all cable circuitry in Alaska. AT&T submitted a proposal to provide PSMCC with two T-1 private line submarine fiber optic circuits at a custom fiber rate that was not a mileage based rate.

On July 31, 2009, PSMCC finance officer, Maryann Freepartner, submitted a Form 465 to USAC for the two additional T-lines to transmit data and medical images, including X-rays and CT-scans, view dictation and lab results, and to access EMR. The Form 465 was successfully posted to USAC's website. No competitive bids were subsequently received in response to the posting.

On August 28, 2009, PHS entered into an agreement with AT&T to provide PSMCC with two private line circuits at a custom fiber rate with a total monthly recurring charge of \$9,005.20 per line. See Ex. 4 – Pricing Schedule.

On November 3, 2009, the two T-1 circuits were installed.

Following installation of the circuits PSMCC Finance Officer Maryann Freepartner worked with AT&T in gathering the information necessary to submit Form 466s for the T-1 circuits.

¹ Satellite service is not a viable option due to its high latency rate.

On February 22, 2010, Ms. Freepartner submitted the Form 466s for the two T-1 lines. Ex. 5. Since the pricing for the T-1 circuits was not distance-based, funding was requested using the Comprehensive Rate Comparison method.

Following submission of the Form 466s, various email requests for additional information were received from USAC Reviewer Hazel Diaz. Ms. Freepartner, being new to her position as Finance Officer of PSMCC, worked with AT&T Representative Amy Merchant in obtaining the requested information which she in turn provided to USAC Reviewer Ms. Diaz.

Through a letter dated September 30, 2010, two hundred and twenty-five days after submission of the Form 466s, Ms. Freepartner received Funding Commitment Letters for the two circuits. These letters reflected funding amounts for the circuits at rates considerably reduced from what Ms. Freepartner had requested and anticipated based on the actual cost per line per month. See Ex. 6 - Funding Commitment Letters.

On October 12, 2010, in response to a request from Ms. Freepartner for an explanation of funding computation, Ms. Diaz sent an email to Ms. Freepartner explaining that funding was reduced based on information received from AT&T representative Andy Rabung² in response to a request from Ms. Diaz regarding mileage charges associated with the PHS contract. See Ex. 7 - 10/13/10 6:58 a.m. email from H. Diaz to Maryann Freepartner. In her email, Ms. Diaz explained that the rural rate was adjusted based on information obtained from Mr. Rabung that reflected total billed miles for the circuits at 475 miles, that the cost per mile for the circuits was \$17.62 per mile, and that USAC could only cover funding up to the Maximum Allowable Distance of 85 miles, which reduced the funding by \$6,871.80 per line (charges over the MAD).

On October 14, 2010, Ms. Freepartner provided Ms. Diaz with a letter from AT&T which stated that the circuit costs for the PSMCC circuits were not mileage based, but were calculated based on the contract.

On October 15, 2010, Ms. Diaz informed Ms. Freepartner that if she did not agree with the information provided in the funding commitment letters, she could follow up with a formal appeal.

² Mr. Rabung had been recently assigned to cover the PSMCC account in the absence of Amy Merchant, the AT&T representative who had been working on the account from its inception.

On October 26, 2010, Ms. Freepartner submitted her letter of appeal to USAC's RHCD.

On June 13, 2011, after many, many requests for status updates and being informed that PSMCC's appeal was "under review" and a call to USAC's complaint line, Ms. Freepartner was able to speak with USAC Rural Health Care Program Manager Carol McCornac who informed Ms. Freepartner that USAC's reduction in funding based on miles exceeding the Maximum Allowable Distance had been correctly applied. Ms. McCornac informed Ms. Freepartner that PSMCC could continue to pursue the appeal, which would result in a formal Administrators Decision, or request its withdrawal. Ms. Freepartner subsequently requested a formal Administrator's Decision.

On July 1, 2011, in response to a request from Ms. McCornac, Ms. Freepartner sent Ms. McCornac an explanation of the basis for the need for the Anchorage-Kodiak-Seward route in lieu of an Anchorage-Seward route. See Ex. 9 - 7/1/11 11:07 a.m. email from Maryann Freepartner to Carol McCornac.

On July 27, 2011, two hundred seventy-four days after PSMCC filed its appeal, USAC issued its Administrator's Decision on Rural Health Care Program Appeal. Ex. 10. In its decision, USAC denied PSMCC's appeal based on the Maximum Allowable Distance limitation.

QUESTION PRESENTED FOR REVIEW: DID USAC CORRECTLY
CALCULATE THE AMOUNT OF SUPPORT FOR PSMCC'S T-1 CIRCUITS?

I. USAC incorrectly applied a mileage-based charge

In its decision, USAC relies on vague communications between USAC's Ms. Diaz and AT&T's Andy Rabung converting the rate charge and the mileage involved into a cost per mile, which USAC in turn erroneously relies on in denying most of PSMCC's funding request. Mr. Rabung was not involved in the negotiations with PHS for the purchase of the T-1 lines, and at the time USAC sent AT&T the email requesting a breakdown of "billed circuit miles, monthly mileage based charges, and cost per mile" had only recently been assigned to cover the PSMCC account in the absence of AT&T Representative Amy Merchant, who was the person directly involved for AT&T in negotiations for the purchase of the T-1 lines service, their installation, and billing, and who had worked with Ms. Freepartner in filing the Form 466s. The information provided by Mr. Rabung was incorrect. The charge for the circuits was not a mileage-

based charge. In spite of being apprised of this fact, USAC made its funding determination based on a fictitious mileage-based charge.

- II. PSMCC is entitled to advanced telecommunication services at rates that are reasonably comparable to rates charged for similar services in urban areas.

The Universal Service program is administered under authority of 47 USC §254. 47 USC §254(b)(6) provides that the Joint Board and the Commission shall base policies for the preservation and advancement of universal service on the following principles:

- (1) Quality and rates

Quality services should be available at just, reasonable, and affordable rates.

- (2) Access to advanced services

Access to advanced telecommunications and information services should be provided in all regions of the Nation.

- (3) Access in rural and high cost areas

Consumers in all regions of the Nation, including low-income and those in rural, insular and high cost areas, should have access to telecommunications and information services, including interexchange and advanced telecommunications and information services, that are reasonably comparable to those services provided in urban areas and that are available at rates that are reasonably comparable to rates charged for similar services in urban areas.

-
(6) Access to advanced telecommunications services for schools, health care, and libraries

... health care providers ... should have access to advanced telecommunication services as described in subsection (h) of this section.

(7) Additional principles

Such other principles as the Joint Board and the Commission determine are necessary and appropriate for the protection of the public interest, convenience, and necessity and are consistent with this chapter.

47 USC §254(h)(1)(A) provides:

A telecommunications carrier shall, upon receiving a bona fide request, provide telecommunications services which are necessary for the provision of health care services in a State ... to any public or nonprofit health care provider that serves persons who reside in rural areas in that State at rates that are reasonably comparable to rates charged for similar services in urban areas in that State (emphasis added).

III. The Maximum Allowable Distance limitation should not be applied as it results in a rate that is not reasonably comparable.

The purpose of the universal service program is to afford rural health care providers the opportunity to access telecommunications and information services that are "reasonably comparable to those services provided in urban areas and that are available at rates that are reasonably comparable to rates charged for similar services in urban areas." 47 USC §254(b)(3).

Given PSMCC's unique circumstances – its remote location, the mountainous terrain and adverse climatic conditions that impact the functionality of terrestrial wirelines that service Seward, and the fact that the only alternative form of wireline service that could provide the needed bandwidth, diversity and redundancy is a submarine fiber optic cable that, of necessity, runs a course of 475 miles - applying the maximum allowable distance limitation under 47 CFR §54.613 is inconsistent with the purpose and legislative intent of the Universal Service mechanism. Without a recalculation based on PSMCC's original submission, it will be forced to discontinue the AT&T service, and again subject the quality of health care provided in Seward to the inconsistent level of services afforded by strictly terrestrial based communication lines.

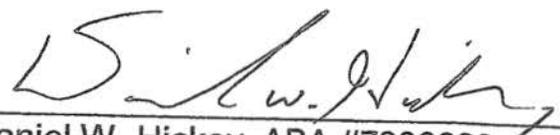
REQUEST FOR RELIEF

Funding should be calculated based on a comprehensive rate comparison method which would result in PSMCC paying a rate that an urban health care provider would pay for similar services. That calculation for the period ending June 30, 2010, is attached as Ex. 1.

Appellant provider PSMCC requests a hearing on this request for review/appeal and reserves the right to submit supplemental material in support of its appeal as appropriate. To the extent that it raises novel questions of fact, law or policy, a hearing is requested before the full Commission.

DATED this 23 day of September, 2011, at Anchorage, Alaska.

GRUENSTEIN & HICKEY
Attorneys for Providence Health & Services – Alaska

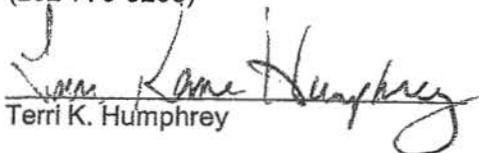
By: 
Daniel W. Hickey, ABA #7206026

cc: Susan Humphrey-Barnett
Area Operations Administrator
Providence Health & Services – Alaska

Certificate of Service

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by Federal Express this 24th day of September, 2011, on:

Rural Health Care Division
Universal Service Administrative Company
2000 L Street, NW, Suite 200
Washington, D.C. 20036
(202-776-0200)


Terri K. Humphrey

2011 9 23
Page 8 of 8

Ex. 14



October 28, 2011

Letter of Appeal
Rural Health Care Division
Universal Service Administrative Company
2000 L Street, NW, Suite 200
Washington, DC 20036

Request for Reconsideration/Appeal for HCP 10382
Packets 102861 and 102862 – Funding Year 2010

We are appealing the calculated funding on these two packets. As in the prior year, we believe the funding calculations for both of these packets are incorrect. USAC has erroneously reduced the applicable rural rate incorrectly as the circuits are not mileage based. Our Funding Request on Form 466 is specific in that we filed based on Block 6: Comprehensive Rate Request rather than Block 5: Mileage-Based Charge Request.

The USAC reviewer incorrectly "discounted" our circuit cost from \$9005.20 to \$2133.40 based on a reduction in covered miles. This reduction is incorrect and needs to be revised. I believe we should receive additional funding of \$103,301.76 per circuit as per my calculations attached.

Please find attached the calculations, bill from AT&T and supplementary information which has been provided in the previous year but is enclosed here for your convenience. Please let us know if you need any further documentation.

We expect a response within 90 days as stated within your guidelines.

Thank you for your consideration.

A handwritten signature in black ink, appearing to read "Maryann Freepartner".

Contact Information:
Maryann Freepartner, Finance Manager
maryann.freepartner@providence.org
907-224-2980 Alaska Time Zone
Fax 907-224-5250
PO Box 365 Seward AK 99664

SUPPLEMENTAL INFORMATION

DISCUSSION OF NEED FOR TELECOMMUNICATIONS

Location: Providence Seward Medical and Care Center (PSMCC) is a rural health care provider in Seward, Alaska. Seward has a population of approximately 3,000 and is located in the Southcentral Region of Alaska, at the head of Resurrection Bay on the eastern shore of the Kenai Peninsula, a rugged wilderness area with a significant mountain range running the length of the peninsula close to the eastern shore. Access to Seward by vehicle is limited to one road stretching 126 miles to Anchorage, Alaska. Other access is by small airplane, helicopter, boat and seasonal train. The weather in Seward, Alaska consists of many days of rain, snow, ice and high winds which make access difficult. Road construction, particularly bridge construction, and avalanches have closed the road periodically. Seward has also experienced many earthquakes and some seasonal flooding.

PSMCC consists of a six-bed Critical Access Hospital including Provider-based clinic and 24-7 Emergency Room and also a 40-bed long-term care facility. Services include emergency services, limited inpatient hospital care, laboratory, radiology, rehabilitation therapy, family care clinic and long-term care.

PSMCC is owned by the City of Seward and managed by Providence Health & Services. Through the alliance with Providence, PSMCC works closely with Providence Alaska Medical Center, the largest hospital in Alaska. Through this alliance PSMCC can provide expanded services through the use of telemedicine, electronic medical records and access to specialists across the full spectrum of care. For the vast majority of heart attack, stroke, and traumatic injury patients on the eastern side of the Kenai Peninsula, PSMCC is the only place where they are stabilized and given initial treatment before being transferred to a tertiary care center, which is often Providence Alaska Medical Center. Electronic medical records facilitate the emergency room treatment and transfer of these patients and contribute to high quality emergency and trauma care.

For many years, PSMCC relied on two T-1 land circuits supplied by GCI that traveled from Seward to Anchorage through the Chugach Mountain Range and which followed the road 126 miles rather than the distance through space of 85 miles. These circuits traverse several mountain passes and are subject to adverse climatic conditions as noted above. These circuits have suffered from outages, particularly during winter months, which have resulted in negative impacts on patient care and safety at PSMCC. The climatic conditions have also resulted in extended stays at PSMCC due to the inability of helicopter access to transport critical patients. These communications literally make the difference between life and death to these patients.

The need for uninterrupted connectivity led in 2009 to the exploration of alternatives to the two land-based T-1 lines. At that point the only feasible addition that would provide diversity in both the route of the connection and the carrier providing the service was a submarine fiber circuit which existed between Seward and Anchorage, the route of which ran through Kodiak, Alaska. AT&T submitted a proposal for two additional T-1 lines at a custom rate based on private line rates in effect. This was not a mileage based rate as assumed by USAC based on the number of miles noted in the contract which was not used in calculation of the rate.

DISCUSSION OF REQUESTS FOR SUPPORT

We believe that we followed all USAC guidelines in putting out a request for bids through Form 465, reviewing the one proposal that satisfied our needs for redundancy and diversity of both carrier and route, and selected the contract proposed by AT&T. Our Request for Support on Form 466 was not based on mileage as the calculation of charges by AT&T was not based on mileage. We filed a comprehensive rate request and not a mileage based rate request. We believe that our funding should be calculated based on a comprehensive rate comparison method.

PROVIDENCE SEWARD MEDICAL AND CARE CENTER
HCP 10382
USAC APPEAL YEAR 2010 PACKETS 102861 AND 102862

<u>FUNDING REQUESTED:</u>	<u>Packet 102861</u>	<u>Packet 102862</u>	<u>Total</u>
Circuit cost per month	9,005.20	9,005.20	
Federal reg fees	1,747.90 *	1,747.90 *	
Taxes	<u>386.10 *</u>	<u>386.10 *</u>	
Total Rural Rate	11,139.20	11,139.20	
Urban rate	<u>198.30</u>	<u>198.30</u>	
Monthly funding request	<u>10,940.90</u>	<u>10,940.90</u>	
Total months 12	131,290.80	131,290.80	
Non-recurring request	-	-	
	<u>131,290.80</u>	<u>131,290.80</u>	<u>262,581.60</u>
<u>Funding commitment received:</u>			
Circuit cost per month	9,005.20	9,005.20	
"Discount" applied in error	<u>(6,871.80)</u>	<u>(6,871.80)</u>	
	2,133.40	2,133.40	
Taxes	<u>407.17</u>	<u>407.17</u>	
Discounted rural rate	2,540.57	2,540.57	
Urban rate including tax	<u>208.15</u>	<u>208.15</u>	
Monthly support	2,332.42	2,332.42	
Total months 12	27,989.04	27,989.04	
Non-recurring request	-	-	
Funding per commitment	<u>27,989.04</u>	<u>27,989.04</u>	<u>55,978.08</u>
Additional funding requested	<u>103,301.76</u>	<u>103,301.76</u>	<u>206,603.52</u>

*Based on representative monthly bill 2/1/11 attached. See calculation page 5 of bill.

AT&T MONTHLY BILL
DATED 2/1/11



at&t Alascom

Interstate Dedicated Private Line Service

ALASCOM, INC. D/B/A AT&T ALASCOM
210 EAST BLUFF DRIVE
ANCHORAGE, ALASKA 99501-1100

MONTHLY INVOICE

PROVIDENCE SEWARD HOSPITAL
PO BOX 365
SEWARD AK 99664

Billing Number: MM S93327 01 001
Account Number: 8002-765-6315
Invoice Number: 8946235193 ORIGINAL

Invoice Date: 02-01-11
For billing inquiries: 1-800-764-8592
To place an order: 1-907-264-7142
For repair service: 1-800-252-7521

Regulatory Commission of Alaska - 1-800-390-2782

New Charges	Monthly Charges 02-01 through 02-28:	\$ 18,010.40	
	Prorated Charges/Credits:	\$ 0.00	
	One-Time Charges/Credits:	\$ 3,985.68	
	Total Charges:		\$ 21,996.08
	Federal Excise Tax:	\$ 0.00	
	State/Local Taxes and Surcharges:	\$ 282.32	
	Total Taxes and Surcharges on Charges:		\$ 282.32
Total Charges, Taxes, and Surcharges:			\$ 22,278.40

Balance Brought Forward	Balance as of Last Monthly Invoice:	\$283,338.49	
	Payments Received:	\$ 396.60 ^{CR}	
	Other Charges and Adjustments:	\$ 0.00	
Balance Brought Forward:			\$282,941.89

Remittance Amount	Total Payable Upon Receipt:	\$305,220.29
--------------------------	------------------------------------	---------------------

To ensure proper credit, please detach this portion and return with remittance.

Remittance Document
Interstate Dedicated Private Line Service

PROVIDENCE SEWARD HOSPITAL
PO BOX 365
SEWARD AK 99664

Address Correction: Please remit payments to:

ALASCOM, INC. d/b/a AT&T ALASKA
P.O. BOX 5019
CAROL STREAM, IL 60197-5019



at&t Alascom

Account Number: 8002-765-6315
Invoice Number: 8946235193
Inquiry Center: USK00211
Telephone Number: 1-800-764-8592

Invoice Date: 02-01-11

Amount Due: \$305,220.29

Amount Enclosed:

80027656315894623519300048600003052202900022278408

EXHIBIT 14
Page 5 of 16



PROVIDENCE SEWARD HOSPITAL

Billing Number: MM 553327 01 001
Account Number: 8002-765-6315
Invoice Number: 8946235193 ORIGINAL
Invoice Date: 02-01-11

JUST FOR YOUR BUSINESS

AT&T will charge a \$25 fee for any check returned for insufficient funds, applied to your next invoice. AT&T values your business and thanks you for your cooperation in this matter.

From time to time, AT&T may change the names of services, Service Capabilities, or Service Components, or other terminology. The old terminology may remain in use for some time after such changes (such as in contract documents and billing records). For example, your customer bill and other customer documents may refer to Private Line Service (PLS) as Accunet, and may refer to DS0 service as Accunet Spectrum of Digital Services (ASDS) or Single Channel Service. Should you have any questions about the service name appearing on your bill, please refer to the 'Table of Changed Terminology' located in the AT&T Service Guides and applicable state tariffs.

REGULATORY NEWS

Your telecommunications services are provided by one or more of the following AT&T Corp. subsidiaries based on the type of service provided, and the location at which it is provided: AT&T Communications of (State), and or TCG (State). To view service publications go to att.com/servicepublications and click on the Service Guide and or Tariff.

Bill Period is the monthly period that the customer's bill processing started and ended. The Usage is usually billed within the current Bill Period and Monthly Recurring Charges (MRCs) are billed one month in advance.

For example:

- Invoice date April 1, Usage/Bill Period March 1 through March 31, MRCs April 1 through April 30
Invoice date April 11, Usage/Bill Period March 11 through April 10, MRCs April 11 through May 10
Invoice date April 19, Usage/Bill Period March 19 through April 18, MRCs April 19 through May 18.

Attention Valued AT&T Customers

If your invoice includes any back-billed charges, you have the right to pay these charges in full with your regular bill, or to call AT&T to make reasonable payment arrangements. You may choose to pay the back-billed amount in monthly installments equal to the number of back-billed months. Please take note that you must pay the full amount of your phone bill each month, including installments to repay back billed - charges, in order to avoid possible disconnection and other charges and penalties. If you are interested in using this payment method for any back-billed amount, please call AT&T on the toll-free number located on your bill.

If your business makes outbound telephone solicitations, you must comply with federal do-no-call laws and regulations (47 C.F.R.64.1200, and 16 C.F.R.310) and any applicable state laws.

EXHIBIT 14
Page 6 of 10



PROVIDENCE SEWARD HOSPITAL

Billing Number: MM S53327 01 001
Account Number: 8002-765-6315
Invoice Number: 8946235193 ORIGINAL
Invoice Date: 02-01-11

REGULATORY NEWS

(continued)

Federal regulation requires AT&T to inform our valued customers that basic local services will not be disconnected for the non-payment of your non-regulated service charges. To avoid collection activity, please remember to pay all charges by the due date.

In addition, you may experience disconnection of your basic local service if payment is not received for the Long Distance portion of your bill except in the states: Alabama, Arizona, Colorado, Hawaii, Idaho, Indiana, Iowa, Maryland, Michigan, Minnesota, Missouri, New Mexico, New York, New Jersey, North Carolina, North Dakota, Ohio, Oklahoma, Pennsylvania, Texas, Utah, Vermont, Virginia, Washington and the District of Columbia.

AT&T Calling Card is a US-based telecommunications service provided by AT&T Corp. Worldwide access is provided on a bilateral basis in cooperation with AT&T's correspondent carriers in non-US jurisdictions, and in accordance with the Regulations of the International Telecommunications Union, as applicable.

DO NOT CALL

If your business makes outbound telephone solicitations, you must comply with federal do-not-call laws and regulations (47 C.F.R. 64.1200 and 16 C.F.R. 310) and any applicable state laws.

Important News About Your Account

You are requested to provide in writing to AT&T, within six months of the date of this bill, any dispute with respect to the charges on this bill, unless a different notification period applies under your contract, State Tariff and/or Service Guide.

You can reach AT&T either by using the toll free number on your bill, or in writing at the address listed at the top of the first page of your invoice.

http://serviceguide.att.com/service/library/business/ext/state_tariff_buss.cfm

If you receive service pursuant to a signed contract or other term agreement with AT&T and it is currently in effect, its terms will govern the provision of your AT&T service.

AT&T's standard contract for detariffed services not covered by a signed contract or term agreement, including expired contracts or term plans that are not renewed, can be found at: att.com/agreement. Important limits of liability apply, including: AT&T is not liable for indirect or consequential damages (such as your lost profits or other economic loss), and direct damages during any 12 months cannot exceed one month of your payments for affected service(s).

Additional terms, conditions, charges and price change information for all detariffed business services can be viewed at http://www.att.com/serviceguide/business. If you do not have access to the Internet, please contact your AT&T Sales Representative or Customer Care Center for information.

End of Messages

Thank you for choosing AT&T, we appreciate your business

EXHIBIT 14
Page 7 of 16



at&t Alarm

Interstate Dedicated Private Line Service

PROVIDENCE SEWARD HOSPITAL

Billing Number: MM SS3327 01 001
Account Number: 8002-765-8315
Invoice Number: 8946235193 ORIGINAL
Invoice Date: 02-01-11

Payment Date	Payment Description	Payment Method	Amount
--------------	---------------------	----------------	--------

Payments

12-30-10	PAYMENT RECEIVED	0000761247	\$396.61
----------	------------------	------------	----------

Total Payments Applied: \$396.61

EXHIBIT 14

Page 8 of 16





PROVIDENCE SEWARD HOSPITAL

Billing Number: MM SS3327 01 001
Account Number: 8002-765-6315
Invoice Number: 8946235193 ORIGINAL
Invoice Date: 02-01-11
For billing inquiries: 1-800-764-8592

Table with 6 columns: Description, Monthly Charges, Prorated Charges/Credits, One-Time Charges/Credits, Taxes and Surcharges, Total

Circuit Charges

REGULATORY/OTHER CHARGES

Table listing regulatory charges: ADMINISTRATIVE EXPENSE FEE-DCS, FEDERAL REGULATORY FEE-DCS, PROPERTY TAX ALLOTMENT-DCS, UNIVERSAL CONNECTIVITY-DCS

ACCUNET® T1.5 MBPS SERVICE

Table for AccUNET service with columns for Description, Monthly Charges, Prorated Charges/Credits, One-Time Charges/Credits, Taxes and Surcharges, Total. Includes sub-totals for Total Circuit Charges and Total This Account.

Table with 5 columns: Description, Total Promotional Savings, Total Discount Plan Savings, Total Interruptions, Total Service Assurance Warranty

Account Totals Reflect the Following

Table showing account totals for ACCUNET® T1.5 MBPS SERVICE with columns for Description, Total Promotional Savings, Total Discount Plan Savings, Total Interruptions, Total Service Assurance Warranty

FEES PER CIRCUIT

Handwritten calculations for fees per circuit: 158.48 + 385.44 + 2,951.88 + 3,495.8 * 003 = 1,747.9 *

TAXES PER CIRCUIT

Handwritten calculations for taxes per circuit: 489.88 + 282.32 + 772.2 * 002 = 386.1 *

Activity Occurred This Billing Period

EXHIBIT 14
Page 9 of 16



PROVIDENCE SEWARD HOSPITAL

Billing Number: MM 893927 01 001
Account Number: 8002-765-6315
Invoice Number: 8946235193 ORIGINAL
Invoice Date: 02-01-11

Description	Monthly Charges	Prorated Charges/Credits	One-Time Charges/Credits	Taxes and Surcharges
-------------	-----------------	--------------------------	--------------------------	----------------------

Circuit Charges

Monthly, Prorated, and One-Time Charges/Credits for 02-01-11 thru 02-28-11

ADMINISTRATIVE EXPENSE FEE-DCS			\$158.48	\$5.9
FEDERAL REGULATORY FEE-DCS			\$385.44	\$14.4
PROPERTY TAX ALLOTMENT-DCS			\$489.88	\$18.3
UNIVERSAL CONNECTIVITY-DCS			\$2,951.88	\$84.6
Total Circuit Charges:	\$0.00	\$0.00	\$3,985.68	\$123.2
Total This Account:	\$0.00	\$0.00	\$3,985.68	\$123.2
Total Activity Charges, Taxes and Surcharges:	\$4,108.96			



PROVIDENCE SEWARD HOSPITAL

Billing Number: MM S53327 01 001
Account Number: 8002-765-6315
Invoice Number: 8946235193 ORIGINAL
Invoice Date: 02-01-11

Item No.	Description of Charge	Monthly Charges	Prorated Charges	One-Time Charges
----------	-----------------------	-----------------	------------------	------------------

REGULATORY/OTHER CHARGES
ADMINISTRATIVE EXPENSE FEE

Circuit Number: ADMINISTRATIVE EXPENSE FEE-DCS

1	ADMINISTRATIVE EXPENSE FEE-DCS Adjustment			\$158.48
---	--	--	--	----------

Total This Activity:

\$0.00

\$158.48

Total This Circuit:

\$0.00

\$158.48



PROVIDENCE SEWARD HOSPITAL

Billing Number: MM SS3327 01 001
Account Number: 8002-765-6315
Invoice Number: 8946235193 ORIGINAL
Invoice Date: 02-01-11

Item No.	Description of Charge	Monthly Charges	Prorated Charges	One-Time Charges
----------	-----------------------	-----------------	------------------	------------------

REGULATORY/OTHER CHARGES
FEDERAL REGULATORY FEE

Circuit Number: FEDERAL REGULATORY FEE-DCS

2	FEDERAL REGULATORY FEE-DCS Adjustment			\$385.44
Total This Activity:			\$0.00	\$385.44
Total This Circuit:			\$0.00	\$385.44

EXHIBIT 14
Page 12 of 16





at&t Alas Jm

Interstate Dedicated Private Line Service

PROVIDENCE SEWARD HOSPITAL

Billing Number: MM SS3327 01 001
Account Number: 8002-765-6316
Invoice Number: 8946235193 ORIGINAL
Invoice Date: 02-01-11

Item No.	Description of Charge	Monthly Charges	Prorated Charges	One-Time Charges
----------	-----------------------	-----------------	------------------	------------------

REGULATORY/OTHER CHARGES
PROPERTY TAX ALLOTMENT

Circuit Number: PROPERTY TAX ALLOTMENT-DCS

3	PROPERTY TAX ALLOTMENT-DCS Adjustment			\$489.88
---	---------------------------------------	--	--	----------

Total This Activity:

\$0.00

\$489.88

Total This Circuit:

\$0.00

\$489.88

EXHIBIT 14
Page 13 of 16



PROVIDENCE SEWARD HOSPITAL

Billing Number: MM SS3327 01 001
Account Number: 8002-765-6318
Invoice Number: 8948235193 ORIGINAL
Invoice Date: 02-01-11

Item No.	Description of Charge	Monthly Charges	Prorated Charges	One-Time Charges
----------	-----------------------	-----------------	------------------	------------------

REGULATORY/OTHER CHARGES
UNIVERSAL CONNECTIVITY

Circuit Number: UNIVERSAL CONNECTIVITY-DCS

4	UNIVERSAL CONNECTIVITY CHARGE-DCS Adjustment			\$2,951.88
---	---	--	--	------------

Total This Activity:	\$0.00	\$2,951.88
Total This Circuit:	\$0.00	\$2,951.88
Total All Circuits:	\$0.00	\$3,885.68
Total This Account:	\$0.00	\$3,885.68

EXHIBIT 14
Page 14 of 10





PROVIDENCE SEWARD HOSPITAL

Billing Number: MM SS3927 01 001
Account Number: 8002-765-6315
Invoice Number: 8946235193 ORIGINAL
Invoice Date: 02-01-11

Description	Federal Excise Taxes	State Taxes	County Taxes	Local Taxes	Other Taxes and Surcharges
-------------	----------------------	-------------	--------------	-------------	----------------------------

Circuit Level Taxes

DHEC 744587 ALS ALASKA			\$34.08	\$45.44	
DHEC 745718 ALS ALASKA			\$34.08	\$45.44	
ADMINISTRATIVE EXPENSE FEE-DCS ALASKA			\$2.52	\$3.38	
FEDERAL REGULATORY FEE-DCS ALASKA			\$6.18	\$8.24	
PROPERTY TAX ALLOTMENT-DCS ALASKA			\$7.86	\$10.50	
UNIVERSAL CONNECTIVITY-DCS ALASKA			\$36.24	\$48.36	
Subtotal:	\$0.00	\$0.00	\$120.96	\$161.36	\$0.00
Total This Account:	\$0.00	\$282.32			

EXHIBIT 14
Page 15 of 16



PROVIDENCE SEWARD HOSPITAL

Billing Number: MM 55327 01 001
Account Number: 8002-765-8315
Invoice Number: 8946235193 ORIGINAL
Invoice Date: 02-01-11

Billing Details - Information Only

PROMOTIONAL DISCOUNT SAVINGS REPORT
FOR MONTH BEGINNING FEBRUARY 01, 2011

CUSTOMER BILLING NUMBER
NM 55327 01 001

Table with columns: CIRCUIT IDENTIFIER, PROMO NUMBER, CKL/TRM OR IOC SECTION NUMBER, USOC, MONTHLY CHARGE, MONTHLY CHARGE DISCOUNT AMOUNT, MONTHLY CHARGE DISCOUNT PERCENT, SERVICE CHARGE, SERVICE CHARGE DISCOUNT AMOUNT, SERVICE CHARGE DISCOUNT PERCENT. Includes rows for DHEC744587 and DHEC745718.

EXHIBIT 14
Page 16 of 66

Ex. 15