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REDACTED FOR PUBLIC INSPECTION — SUBJECT TO SECOND PROTECTIVE ORDER
IN GN DOCKET NOS. 13-5 & 12-353 BEFORE THE FEDERAL COMMUNICATIONS
COMMISSION

March 25, 2014

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

Re: *Technology Transitions, GN Docket No. 13-5; AT&T Petition to Launch a Proceeding
Concerning the TDM-to-IP Transition, GN Docket No. 12-353*

Dear Ms. Dortch:

On March 21, 2014, Frank Simone, Dave Talbott, Bob Barber, and I from AT&T met with Commission staff to respond to their questions regarding AT&T's Proposal for Wire Center Trials filed in the above-referenced dockets. The following Commission staff attended the meeting:

Wireline Competition Bureau

Julie Veach
Jamie Susskind
Jonathen Reel
William Layton
Thomas Parisi
Matt DelNero
Heather Henderson*
Tim Stelzig

Office of the Chairman

Dan Alvarez

Consumer and Government Affairs Bureau

Aaron Garza
Mark Stone

Office of Strategic Planning

Jonathan Chambers
Henning Schutzrinne

Public Safety and Homeland Security Bureau

John Healy
Tim May*

Office of General Counsel

Linda Oliver
Jerry Stanshine*

Office of Engineering and Technology

Water Johnson*
Padma Krisnasuzmy

Wireless Telecommunications Bureau

David Valdez
Nese Guendelsberger *

Office of the Managing Director

Tisha Littleton*

*** participated by phone**

Attached hereto are the questions posed by the staff and AT&T's responses, which were discussed during the meeting. AT&T's responses contain highly confidential information entitled to protection pursuant to the terms of the Protective Order and Second Protective Order in these dockets. *Technology Transitions, AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition*, GN Docket Nos. 13-5, 12-353, Protective Order, DA 14-272 (rel. Feb. 27, 2014); *Technology Transitions, AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition*, GN Docket Nos. 13-5, 12-353, Second Protective Order, DA 14-273 (rel. Feb. 27, 2014). All highly confidential information in the attached document has been redacted. AT&T is submitting the attached, redacted version of this *ex parte* electronically via ECFS. AT&T will submit three copies of the highly confidential version, one of which will be delivered to the Secretary's Office, and two of which will be delivered to Jonathan Reel of the Wireline Competition Bureau.

If you have any questions, please contact me.

Sincerely,

/s/ Christopher M. Heimann

cc: Jonathan Reel

Enclosure

Numeric data

1. AT&T states that its proposed wireline IP network will cover **Begin Confidential** [REDACTED] **End Confidential** of AT&T's current business customers in Carbon Hill and **Begin Confidential** [REDACTED] **End Confidential** of AT&T's current business customers in Kings Point. Proposal at 19 n.12. Are any of AT&T's existing business customers in Carbon Hill in the area that AT&T proposes to exit altogether?

Answer: In its filing, AT&T reported there were **Begin Confidential** [REDACTED] **End Confidential** business customers in Carbon Hill in red-red locations. (*i.e.*, locations outside AT&T's wireline IP and wireless footprint). AT&T has determined that **Begin Confidential** [REDACTED] **End Confidential** of these customers are within AT&T's wireline IP or wireless footprint. AT&T is considering its options for the business customers at the **Begin Confidential** [REDACTED] **End Confidential** remaining red-red locations.

AT&T notes that AT&T has not proposed to "exit" (*i.e.*, stop serving) customers at red-red locations. Rather, it is still considering its options for serving customers at those locations. AT&T may yet determine that it is unable to continue serving such locations under existing conditions (*i.e.*, given existing technology and the business case for serving those areas). But, technological developments and/or changes to the business case (*e.g.*, additional universal service support) could change the equation.

2. AT&T states that **Begin Confidential** [REDACTED] **End Confidential** of living units in Kings Point will not have an AT&T wireline broadband option and that **Begin Confidential** [REDACTED] **End Confidential** of AT&T's existing DSL customers are among that number. Proposal at 15, Operating Plan at 44. Could you confirm the numbers?

Answer: The numbers in the plan are correct. To the extent there appears to be a discrepancy between them, it is because the numbers refer to different data sets. The **Begin Confidential** [REDACTED] **End Confidential** refers to Living Units (LUs), while the **Begin Confidential** [REDACTED] **End Confidential** refers to existing customers.

Wireless Home Phone

3. *Replacement for DSL Customers.* Under AT&T's proposal, some existing DSL customers will lose the option of wireline Internet access service: **Begin Confidential** [REDACTED] **End Confidential** of AT&T's existing customers in Carbon Hill and **Begin Confidential** [REDACTED] **End Confidential** of customers in Kings Point.

- a. To what percentage of living units in the wireless-only areas does AT&T offer DSL service today?

Answer: In Kings Point, **[**Begin Confidential**]** **[REDACTED]** **[**End Confidential**]** of LUs in wireline red, wireless green area are DSL qualified. In Carbon Hill, **[**Begin Confidential**]** **[REDACTED]** **[**End Confidential**]** of LUs in the wireline red, wireless green area are DSL qualified.

- b. Does AT&T currently offer DSL service in the areas of Carbon Hill where it proposes to exit the market?

Answer: All but **[**Begin Confidential**]** **[REDACTED]** **[**End Confidential**]** of the customers located outside the footprint of AT&T's wireline IP network also are at locations that AT&T could not serve with DSL today. Most of these customers will be able to purchase Wireless Home Phone and Internet service.

- c. What are the speeds, prices, and usage capacities of AT&T's DSL plans in Carbon Hill and Kings Point? How do these compare to the speeds, prices, and usage capacities of the Wireless Home Phone plans that AT&T proposes as a substitute for its DSL offerings? For each existing DSL plan, could you share how many customers AT&T has today in Carbon Hill and Kings Point?

Answer:

[Begin Confidential**]**

versus

Speed	DSL Line Share ¹	
	Rack Pricing	Usage
[REDACTED]	[REDACTED]	[REDACTED]

Speed	Wireless Home Phone and Internet ²	
	Rack Pricing	Usage
[REDACTED]	[REDACTED]	[REDACTED]

¹ DSL Line Share is a bundled POTS and DSL service.

² WHPI is a voice and data service. The prices set forth for Wireless Home Phone and Internet have not yet been finalized.

versus

Speed	Stand-Alone DSL ⁴	
	Rack Pricing	Usage
[REDACTED]	[REDACTED]	[REDACTED]

Speed	Mobile Hot Spot ³	
	Rack Pricing	Usage
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

	Carbon Hill		Delray Beach	
	DSL Line Share	Stand-Alone DSL	DSL Line Share	Stand-Alone DSL
Existing Customers	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

End Confidential

4. *Technology/classification.* AT&T describes Wireless Home Phone as a CMRS product. What wireless technologies does Wireless Home Phone use today? Will Wireless Home Phone be a Voice over LTE (VoLTE) product in the trial areas after AT&T's LTE network is deployed there?

Answer: Wireless Home Phone today uses **Begin Confidential** [REDACTED] **End Confidential** and falls back to **Begin Confidential** [REDACTED] **End Confidential** if **Begin Confidential** [REDACTED] **End Confidential** connectivity is unavailable. It currently does not use **Begin Confidential** [REDACTED] **End Confidential** is available. Once **Begin Confidential** [REDACTED] **End Confidential** is available, AT&T expects to offer both **Begin Confidential** [REDACTED] **End Confidential** capable devices for purchase.

5. *Audio quality.* The proposal notes that there are audio quality differences between wireline voice services and CMRS. Proposal at 44.
 - d. The Mean Opinion Score AT&T provides for Wireless Home Phone is **Begin Confidential** [REDACTED] **End Confidential**. Operating Plan at 55. Can you provide

³ Mobile Hot Spot is a data-only service.
⁴ Stand-Alone DSL is a data-only service.

this score rounded to the nearest hundredths to allow more meaningful comparison to the MOS scores provided for PSTN and U-verse voice? As it is, the score is consistent with a MOS of **Begin Confidential** [REDACTED] **End Confidential**.

Answer: The Mean Opinion Score for Wireless Home Phone is **Begin Confidential** [REDACTED] **End Confidential**.

- e. AT&T states that after HD voice is deployed, the audio quality for VoLTE calls is expected to be superior to traditional POTS services. Proposal at 45. What is the timetable for deploying HD voice on Wireless Home Phone?

Answer: **Begin Confidential** [REDACTED] **End Confidential**

- 6. *Availability.* In footnote 11 of the Proposal, AT&T says that “Fewer than one percent of AT&T existing consumer customers with TDM-based services are located in areas outside of AT&T’s IP network footprint and are ineligible for the Wireless Home Phone products because of the wireless network coverage issues.” How many of AT&T’s subscribers nationwide fall into this category?

Answer: AT&T has not calculated the number of existing subscribers nationwide that are located in areas outside AT&T’s wireline IP network footprint and ineligible for Wireless Home Phone due to network coverage issues. Doing so would be very difficult and time-consuming because the one percent number refers to living units, not existing customers (although the number of existing customers necessarily is a subset of living units in any given area), and data regarding existing customers and living units reside in different data bases.

- 7. *Proposed enhancements.* On page 20, AT&T states that Wireless Home Phone doesn't currently support certain analog services such as Internet dial-up and fax service, but that AT&T is working on enhancements to support these services. We would like to hear more about these efforts and the specific services the enhancements will support and those (if any) that will not be supported.

Answer: AT&T is working on developing a **Begin Confidential** [REDACTED] **End Confidential**, which is intended to support standards-based analog health monitoring, home alarm, fax and POS (credit card validation) devices. AT&T is not developing a **Begin Confidential** [REDACTED] **End Confidential** solution for dial-up Internet applications.

Disability Access

8. AT&T notes that it will not grandfather or discontinue TDM service to a customer who uses any kind of accessibility device that is not supported by IP-based services and for which there is not an alternative available. (Operating Plan at 15 (4.3) and 39 (6.2.1.e))

- a. Will AT&T restore TDM-based service after migrating an end-user location to U-verse or Wireless Home Phone if the customer later requests support for a TDM-based accessibility device, or if a new customer who uses a TDM-based accessibility device moves into that dwelling?

Answer: To date, AT&T has not identified any assistive technology device that is incompatible with U-verse voice or AT&T's Wireless Home Phone (once AT&T has implemented the circuit switched data enhancement, which is discussed in response to question 7) service. But, if a customer's assistive technology device does not work with U-verse voice or Wireless Home Phone, AT&T would ask the customer to obtain an IP-compatible device if possible. If no such device is available, or the customer is unable to obtain one for some other reason, we will work with the customer to develop a solution, which may include restoring TDM-based service for that customer's location during the trial.

- b. Is AT&T developing a technical solution to address accessibility devices that aren't supported by IP-based services? If so, please explain, including the expected timeline.

Answer: As noted above, we have not identified any assistive technology device that is incompatible with U-verse voice or Wireless Home Phone. We have asked disability organizations to advise AT&T of any assistive technology and/or assistive device that might be incompatible with either service. To the extent they, or any of our customers, identify any such devices, we will test the device in AT&T's lab to determine whether there is a compatibility issue, and to determine how best to resolve the issue.

9. On page 7, AT&T states that more than 70 percent of subscribers served by the Florida wire center are 50 years old or older. Has it identified potential disabilities issues that it may need to address for this older-than-average population?

Answer: While the percentage of the population with a disability increases with age, older persons' disabilities are not different in kind from those of other persons with disabilities. Consequently, older persons with disabilities will benefit from AT&T's user-centered approach to meeting the communications accessibility needs of all of its customers, including the systematic review of all AT&T's products and services by AT&T's Corporate Accessible Technology Office to ensure they are accessible.

10. On page 37 of its Operating Plan, AT&T states that it plans outreach to people with disabilities, and is seeking the help of national and local organizations to do so. What groups is AT&T considering working with?

Answer: In developing its outreach plan for persons with disabilities and other unique needs, AT&T met with experts from multiple disability groups to discuss AT&T's plans for conducting trials of the IP transition and to obtain their views on how best to accommodate the needs of persons with disabilities and other unique needs. These include:

- Alexandra Bennewith, United Spinal Association
- Kelly Buckland, National Council on Independent Living
- Henry Claypool, American Association of People with Disabilities
- Lise Hamlin, Hearing Loss Association of America
- Andrew Phillips, National Association of the Deaf
- Howard Rosenblum, National Association of the Deaf
- Paul Schroeder, American Federal of the Blind
- Claude Stout, Telecommunications for the Deaf and Hard of Hearing, Inc.
- Anne Taylor, National Federation of the Blind
- Jim Tobias, Inclusive Technologies
- Christian Vogler, Gallaudet University

AT&T is in the process of soliciting proposals from these and other for participation in AT&T's outreach plan.

11. Could you discuss plans to ensure that the trials do not disrupt or degrade any of the following: (a) TRS; (b) transmission of closed captions and video descriptions, and (c) Real-time Text (RTT) functionality?

Answer:

- a. AT&T's replacements for traditional, TDM-based voice telephone services (*i.e.*, U-verse voice and Wireless Home Phone) are capable of dialing 711 and will pass TTY messages.
- b. U-verse Video Service already transmits closed captions and video descriptions; the trials will not affect this service.
- c. RTT will function over AT&T's high speed Internet access services.

Cost

12. AT&T states that it does not offer its VoIP services on a standalone basis. Operating plan at 40.

- a. What is the total price, after fees, etc., of AT&T's least expensive standalone voice service in the trial areas? (We would also be interested in knowing the prices of AT&T's other standalone voice service offerings if not burdensome to compile.) As a reference point, AT&T states that the average monthly bill for traditional voice telephone services (including local telephone service with features and long distance services) for Lifeline customers in Carbon Hill was **Begin Confidential** and for Lifeline customers in Kings Point it was **Begin Confidential**, including the Lifeline discount. Operating plan at 43 n.93.

Answer: The total price of AT&T's least expensive standalone TDM voice service in Carbon Hill is \$48 per month, which is the price for local exchange service (with unlimited local calling) and unlimited long distance calling, in addition to a \$6.80 SLC, \$0.15 TRS fee, and \$1.99 Carrier Cost Recovery Fee. In Kings Point, the total price is \$46 per month, which includes unlimited local calling, unlimited long distance, a \$6.80 SLC, \$0.15 TRS fee, \$1.99 CCRF, and \$0.33 ARC.

- b. What is the total price, after fees, etc., of AT&T's least expensive wireline and wireless Internet access service that would provide highly reliable VoIP service with good audio quality?

Answer: See response to Question 3(c).

13. What will replace the low cost voice services described above for customers in the trial areas?

Answer: AT&T's stand-alone voice offering for the Trial will be Wireless Home Phone.

Other consumer-related questions

14. Will consumers be able to make dial-around calls using credit cards or pre-paid calling cards?

Answer: U-verse and Wireless Home Phone can dial any number in the North American Numbering Plan, including 8YY numbers. Thus, consumers can use prepaid calling services in addition to 8yy-based operator service calling platforms. However, U-verse and Wireless Home Phone services do not support dial-around 10XXX calls. AT&T had no reason to develop this capability for those services because they already provide unlimited domestic calling.

15. Are you planning to offer any services beyond plain voice service, e.g., HD audio or (IMS) video, on your U-Verse landline platform?

Answer: Yes, **[**Begin Confidential**]**

[End Confidential**]**

16. To what extent are U-verse and Wireless Home Phone capable of supporting abbreviated dialing codes other than 911? We understand that U-verse voice supports 211, 311 and 511 service on a limited geographic basis, although the 311 or 511 codes are not active or operational in the experiment wire centers. *See* <http://www.att.com/esupport/article.jsp?sid=KB409036&cv=814>; Operating Plan at 14.n.26. What about the other codes and such services on Wireless Home Phone?

17. On page 52 of its Operating Plan, AT&T states that it does not bill for other providers' services on its VoIP bills. Is that also the case for the Wireless at Home product?

Answer: AT&T provides third-party billing for all of its CMRS services, including Wireless Home Phone. However, most third-party billing for AT&T's CMRS services are for ring-tones and other applications used on devices that provide much broader functionality than Wireless Home Phone (which simply allows an existing, analog telephone hand-set to connect to AT&T's CMRS network).

18. On page 52 of its Operating Plan, is the last part of the first sentence in the second paragraph missing "as" before "if?" (i.e., should it read "AT&T's bills for those services would comply with the truth-in-billing requirements as if they did apply"?).

Answer: Yes.

Public Safety

19. Alabama has a large-scale NG911 deployment effort and one of the counties in AT&T's proposal is part of the IP transition experiment. The proposal did not appear to address NG 911, however. Could you discuss the role of the movement to NG 911 in the context of the trial? Among other things, will the trial explore movement of U-Verse customers to NG 911?

Answer: U-verse Voice and WHP 911 calls will continue to be routed as they are routed today. The Trial will not explore the movement of U-verse or WHP customers to NG-911.

The Alabama Next Generation Emergency Network (ANGEN) is in the process of being implemented to deliver Next-Gen 911 capabilities to Alabama citizens. Governance of this initiative is the responsibility of the Statewide 911 Board. Project management is being handled by Auburn University Montgomery – Center for Advanced Technologies. The winning bidder for the project is iNetwork/Bandwidth.com. The NG911 project has 3 phases. Phase I – establish core infrastructure and logic to allow wireless 911 calls to be delivered into the ANGEN routing core. This phase is in its early stages and has not

reached the point of direct delivery to the ANGEN core. Phase II – Connect the ANGEN core to every participating emergency communications district in Alabama. Once connected, all wireless 911 traffic will be routed through the ANGEN network. Phase III – Move all wireline 911 calls into the ANGEN core. The project is expected to take 3 or more years to complete.

20. On page 22 of its Operating Plan, AT&T states that it will upgrade the 911 capability of Wireless Home Phone by adding an ALI function to emulate the customer’s experience with wireline TDM service. Is there an estimated timeline for obtaining this level of accuracy of location for Wireless Home Phone customers?

Answer: [**Begin Confidential**] [REDACTED] [**End Confidential**]

21. The proposal also says that Wireless Home Phone subscribers will be able to update their address easily and accurately when the base station device has been moved to a new location. What are the methods for subscribers, including persons with disabilities, to easily update their address?

Answer: Customers will be able to update their location address by accessing a secure web site or by calling their AT&T customer care center.

22. For the customers that transition to the Wireless Home Phone product, what are AT&T’s plans to ensure reliable indoor signal quality in order to reach 911? For example, has AT&T determined if any customers in a targeted wireless-only area may reside in areas where it is difficult to obtain a reliable signal indoors (e.g., due to difficult topography)?

Answer: AT&T has modeled all LUs within the two trial wire centers to determine which LUs will have an adequate indoor wireless signal. AT&T excluded from the Wireless Home Phone footprint all living units located in areas where a customer would not receive an adequate indoor wireless signal. To the extent a customer does not receive an adequate signal, they will have the option to terminate the service and return the Wireless Home Phone device as described in the Wireless Customer Agreement.

23. Could you elaborate upon the current thinking with respect to the 4% of customers in Carbon Hill who would not be within either the wireline or wireless footprint?

Answer: See response to Question 1.

Wholesale services

24. The proposal states that “wholesale customers will have the opportunity to obtain bare copper loops and utilize their own electronics to provide high capacity services to their end user customers.” Proposal at 29. Do we correctly understand that there will be no changes in the availability of (bare) UCLs and that competitive LECs will continue to have the ability to

bond UCLs throughout Kings Point and Carbon Hill to offer their own retail services (e.g., Ethernet)?

Answer: Yes; AT&T will continue to make existing bare copper loops available throughout the trial.

25. Is there any update about the catch products that will be available for wholesale customers? At what point does AT&T expect to be able to announce those catch products publicly?

Answer: AT&T has no update at this time. AT&T will not seek to grandfather existing TDM-based services, including wholesale services, until it has a replacement product available in the trial wire centers. AT&T will announce such products as soon as possible.

26. How will any future wholesale phase of the trial affect the ability of consumers to make calls from payphones, including coinless access calls?

Answer: Payphone (coin) lines currently are excluded from the IP transition trial. However, AT&T is monitoring coin line volumes in the trial wire center to determine whether and when to transition such lines off of TDM-based services. According to AT&T's records, as of August 1, 2013, there was **Begin Confidential** [REDACTED] **End Confidential**] coin line in Carbon Hill and **Begin Confidential** [REDACTED] **End Confidential**] coin lines in Kings Point. AT&T's VoIP services currently do not support payphone calls because SIP does not contain OLI, which is used to provide Flex ANI information.

Interconnection

27. The proposal states that there will not be any material impact on providers with existing interconnection arrangements and adds that AT&T "does not intend to test IP-to-IP interconnection in the context of these wire center trials." Operating Plan at 47-48, 50. What are AT&T's plans for any requested VoIP interconnection arrangements with non-affiliated providers seeking to terminate traffic to customers of AT&T's VoIP voice, Wireless Home Phone, or IP replacement services in the two wire centers during any phase of the trials?

Answer: AT&T U-verse Voice and AT&T Mobility, which provides Wireless Home Phone, already interconnect and exchange traffic with other service providers throughout their service areas. Unaffiliated providers seeking to terminate traffic to U-verse voice and Wireless Home Phone customers thus will use existing interconnection arrangements to exchange traffic with AT&T.

28. AT&T says “[t]here should be no material cost impact on interconnecting carriers attributable to this phase of the trials” due to routing changes. Operating Plan at 48. What does AT&T consider to be a “material” cost in this regard?

Answer: Because interconnecting carriers already have interconnection arrangements in place to exchange U-verse Voice and Wireless Home Phone traffic, interconnecting carriers will incur minimal, if any, incremental interconnection costs. As traffic to AT&T’s TDM customers declines, interconnecting carriers likely will need to reduce their trunk groups for circuit-switched traffic and augment trunk groups to U-verse Voice and Wireless Home Phone. Because circumstances vary, AT&T is not able to determine how, if at all, interconnection costs will change for interconnecting service providers.

Data collection

29. We are interested in discussing AT&T’s data collection efforts in more detail and better understanding the nature of the data to be collected.

Answer: AT&T is willing to meet to discuss its proposed data collection effort in greater detail.

30. We also are interested in discussing and learning more about the control groups.

Answer: AT&T is now identifying wire centers that are similar to Carbon Hill and Kings Point, and which have a comparable number of customers and product set.

Some potential control wire centers with similar number of customers and product set are in the same region, but not the immediate geographic area, of the trial wire centers. AT&T will consult with Commission staff as it determines which wire centers to use as controls.

Wire Centers

31. For both wire centers, what percentage of customer locations outside the wireline footprint have available a wireline alternative provided by someone other than AT&T?

Answer: **[**Begin Confidential**]** [REDACTED]
[End Confidential**]**

Network

32. What is the loop length limitation for IPDSLAM?

Answer: **[**Begin Confidential**]** [REDACTED]
[End Confidential**]**

33. Has AT&T upgraded its network in the trial areas to a greater extent than it is doing in non-trial areas?

Answer: No.

Product

34. Will the WHP CSD utilize a LTE path?

Answer: **[**Begin Confidential**]** [REDACTED] **[**End Confidential**]**

35. Will AT&T test home security alarms, health monitors, fax machines and POS terminals prior to CSD rollout? How?

Answer: Yes. AT&T has extensive testing methods for such devices. AT&T can replicate the environment for such applications in its lab, and thus need not conduct tests in the trial wire centers themselves.

36. Do the same LNP policies apply to IP replacement services as POTS?

Answer: Yes.

Public Safety

37. In the Carbon Hill wire center, would AT&T be willing to trial sending 911 calls through the NG911 currently being deployed in Alabama?

Answer: AT&T is evaluating doing so and will inform the Commission on any future developments, with the understanding that there is a difference between the planned Alabama NG911 system and the deployment of an IP-based NG911 system. Any NG911 cooperative testing would likely be done outside the scope of the IP service trials.

38. Will Wireless Home Phone route a 911 call to the same PSAP to which a POTS call would be routed?

Answer: 911 calls from a Wireless Home Phone will be routed in the same way as other 911 calls from CMRS devices. To the extent a customer is using Wireless Home Phone in a location other than the customer's home, 911 calls may be routed to a different PSAP than the legacy POTS line.

Rates and Charges

39. What 911 fees apply to WHP?

Answer: For Carbon Hill, \$1.60. For Kings Point, \$0.50