

APPENDIX B

Incumbent LEC Study Area Average AMOU per Month

Study Area Code	State	Study Area Name	2006 USF Loops*	2006 Industry MOUSs*	2006 AMOUS/Loop/Mo
552284	NV	BEEHIVE TEL CO - NV	152	209,579,670	114,901
351150	IA	DIXON TEL CO	592	211,115,428	29,718
351307	IA	SUPERIOR TEL COOP	325	58,146,936	14,909
502284	UT	BEEHIVE TEL CO - UT	1,002	173,110,340	14,397
351209	IA	INTERSTATE 35 TEL CO	1,427	241,192,909	14,085
350739	IA	REASNOR TEL. CO.	608	96,258,035	13,193
351166	IA	FARMERS & MERCHANTS	1,417	214,618,371	12,622
351177	IA	FARMERS TEL CO -RICE	1,583	201,215,438	10,593
351292	IA	SEARSBORO TEL CO	469	56,991,254	10,126
411831	KS	S. CENTRAL TEL - KS	1,747	73,018,687	3,483
371553	NE	GLENWOOD TEL MEMBER	2,327	57,616,243	2,063
411847	KS	WHEAT STATE TEL, INC	2,549	52,209,833	1,707
431966	OK	ATLAS TEL CO	1,615	30,413,288	1,569
351278	IA	READLYN TEL CO	1,358	23,046,648	1,414
220371	GA	INTERSTATE TEL CO	12,911	204,141,988	1,318
190253	VA	VIRGINIA TEL CO	2,283	34,789,228	1,270
371537	NE	DALTON TEL CO, INC	1,135	16,720,928	1,228
512297	WY	UNION TELEPHONE CO	6,903	91,097,168	1,100
351232	IA	LYNNVILLE TEL. CO.	487	6,353,059	1,087
421951	MO	STOUTLAND TEL CO	1,566	20,276,068	1,079
391657	SD	ALLIANCE-SPLITROCK	8,017	98,550,533	1,024
351274	IA	CENTURYTEL-POSTVILLE	1,764	21,308,067	1,007
351306	IA	SULLY TEL ASSOC	820	9,413,893	957
391666	SD	JEFFERSON TEL CO -SD	476	4,704,779	824
210330	FL	SMART CITY TEL LLC	13,979	133,103,797	793
351297	IA	HEART OF IOWA COMM.	5,928	56,394,630	793
442038	TX	BLOSSOM TEL CO	1,324	10,746,613	676
361495	MN	VALLEY TEL CO - MN	760	5,877,273	644
411791	KS	LA HARPE TEL CO INC	383	2,912,393	634
643300	VI	VITELCO-INNOVATIVE	68,130	477,179,734	584
613011	AK	INTERIOR TEL CO INC	8,211	57,014,626	579
411829	KS	S & A TEL CO INC	889	6,036,978	566
371556	NE	HARTINGTON TEL CO	1,593	10,760,943	563
532390	OR	OREGON-IDAHO UTIL.	735	4,923,265	558
351283	IA	ROYAL TEL CO	454	2,960,531	543
504449	UT	NAVAJO-UT-FRONTIER	656	4,265,075	542
401727	AR	CENTURYTEL-SOUTH AR	1,297	8,386,716	539
361375	MN	MID-COMM-HICKORYTECH	8,965	57,723,593	537
411833	KS	SOUTHERN KANSAS TEL	4,759	30,412,427	533
200258	WV	WAR ACQ. DBA WAR TEL	1,451	9,216,271	529
613022	AK	ACS-AK GREATLAND	4,062	25,172,677	516
421866	MO	Ozark Tel. Co.	2,591	16,023,241	515
351407	IA	KILLDUFF TEL. CO.	282	1,729,578	511
351309	IA	TERRIL TEL. COOP.	476	2,906,046	509
613004	AK	BUSH-TELL INC.	1,047	6,391,962	509
532226	OR	MIDVALE TEL EXCH -OR	252	1,534,849	508
472230	ID	POTLATCH TEL CO INC	2,094	12,501,463	498
250322	AL	UNION SPRINGS TEL CO	4,577	27,045,984	492
432010	OK	MID-AMERICA TEL INC	1,572	9,239,342	490
512290	WY	ALL WEST COMM.-WY	335	1,957,094	487
351213	IA	JORDAN SOLDIERVALLEY	601	3,492,629	484
220356	GA	COASTAL UTILITIES	34,345	198,629,995	482
432016	OK	PANHANDLE TEL COOP	16,503	95,287,386	481
220351	GA	CAMDEN TEL & TEL CO	22,853	131,473,118	479
542323	CA	WINTERHAVEN TEL. CO.	1,417	8,027,140	472
552351	NV	LINCOLN CTY TEL SYS	2,475	13,951,705	470

Incumbent LEC Study Area Average AMOU per Month

Study Area Code	State	Study Area Name	2006 USF Loops*	2006 Industry MOUSs*	2006 AMOUS/Loop/Mo
230498	NC	SALUDA MOUNTAIN TEL	1,758	9,768,192	463
240521	SC	FORT MILL TEL CO	24,176	132,895,252	458
421908	MO	LE-RU TELEPHONE CO	1,664	9,108,934	456
361362	MN	BRIDGEWATER TEL CO	8,467	45,890,422	452
462188	CO	FARMERS TEL CO - CO	558	2,985,194	446
280462	MS	MOUND BAYOU TEL & CO	892	4,762,905	445
220338	GA	QUINCY TEL CO-GA DIV	779	4,135,695	442
613001	AK	ARCTIC SLOPE TEL	5,329	27,986,425	438
532404	OR	ASOTIN TEL - OR	138	723,360	437
462195	CO	SOUTH PARK TEL. CO.	204	1,063,771	435
403031	AR	SCOTT COUNTY TEL CO	127	658,123	432
432017	OK	PINE TELEPHONE CO	5,942	30,784,391	432
411746	KS	BLUE VALLEY TELE-COM	4,325	22,026,082	424
290559	TN	CONCORD TEL EXCHANGE	20,877	105,701,206	422
371555	NE	HAMILTON TEL CO	5,530	27,376,240	413
482242	MT	INTERBEL TEL COOP	2,293	11,328,605	412
613016	AK	MUKLUK TEL CO INC	4,068	19,949,849	409
462182	CO	BLANCA TEL CO	1,400	6,849,176	408
552220	NV	FILER MUTUAL TEL -NV	631	3,047,749	403
532369	OR	EAGLE TEL SYSTEMS	445	2,126,017	398
210331	FL	ITS TELECOMM. SYS.	3,764	17,936,159	397
190248	VA	SCOTT COUNTY COOP	6,332	30,124,274	396
250304	AL	MILLRY TEL CO	6,957	33,031,498	396
613007	AK	CORDOVA TEL COOP	1,807	8,562,351	395
512295	WY	SILVER STAR TEL-WY	3,361	15,873,362	394
522430	WA	MCDANIEL TEL CO	4,434	20,883,612	392
472226	ID	MIDVALE TEL EXCH INC	1,102	5,189,153	392
532392	OR	PINE TEL SYSTEM INC.	980	4,613,465	392
462204	CO	COLUMBINE ACQ CORP	1,571	7,353,118	390
532378	OR	TRANS-CASCADES TEL	224	1,043,883	388
240523	SC	HARGRAY TEL CO	51,024	236,761,521	387
320825	IN	SUNMAN TELECOMM CORP	4,688	21,637,105	385
120045	NH	KEARSARGE TEL CO	9,593	44,149,768	384
432029	OK	TERRAL TEL CO	283	1,294,372	381
532456	OR	MALHEUR HOME TEL CO (ROR)	11,908	54,422,534	381
140068	VT	TOPSHAM TEL CO	1,664	7,552,180	378
170194	PA	FRONTIER-OSWAYO RIVR	2,186	9,891,553	377
492268	NM	WESTERN NEW MEXICO	6,991	31,560,265	376
483308	MT	BLACKFOOT TEL - CFT	8,983	40,409,451	375
330848	WI	BERGEN TEL CO	209	937,852	374
512291	WY	DUBOIS TEL EXCHANGE	2,371	10,596,910	372
431831	OK	S. CENTRAL TEL - OK	330	1,470,157	371
512289	WY	CHUGWATER TEL CO	210	935,461	371
532388	OR	NORTH STATE TEL CO.	503	2,235,999	370
432014	OK	OKLAHOMA WESTERN TEL	3,349	14,873,126	370
492176	NM	VALLEY TEL COOP - NM	1,359	6,017,520	369
411841	KS	UNITED TEL ASSN	5,416	23,914,381	368
482244	MT	LINCOLN TEL CO INC	1,106	4,879,638	368
140061	VT	NORTHFIELD TEL CO	2,895	12,761,300	367
472295	ID	SILVER STAR TEL- ID	5,297	23,236,716	366
432034	OK	WYANDOTTE TEL CO	762	3,326,747	364
330881	WI	MID-PLAINS TEL CO	31,997	139,195,047	363
475162	ID	QWEST CORP-IDAHO	27,733	120,242,051	361
361500	MN	NORTHERN TEL CO - MN	36	155,553	360
190225	VA	CITIZENS TEL COOP	7,406	31,889,187	359
452200	AZ	FORT MOJAVE TEL, INC	1,126	4,835,912	358
421886	MO	GOODMAN TEL CO	1,844	7,871,421	356
431979	OK	CHEROKEE TEL CO	4,787	20,433,553	356

Incumbent LEC Study Area Average AMOU per Month

Study Area Code	State	Study Area Name	2006 USF Loops*	2006 Industry MOUSs*	2006 AMOUS/Loop/Mo
472215	ID	CAMBRIDGE TEL CO	2,055	8,769,852	356
351405	IA	HILLS TEL CO, INC-IA	2,237	9,538,794	355
552356	NV	RIO VIRGIN TEL CO	10,648	45,388,762	355
401724	AR	SW ARKANSAS TEL COOP	6,170	26,287,664	355
512299	WY	CENTURYTEL OF WY.	5,940	25,300,379	355
210291	FL	GTC, INC.	4,466	19,009,737	355
204339	WV	CITIZENS-FRONTIER-WV	86,246	366,620,497	354
532389	OR	OREGON TEL CORP	1,819	7,705,956	353
484322	MT	CITIZENS-FRONTIER-MT	7,824	33,123,568	353
240512	SC	BLUFFTON TEL. CO.	24,360	103,019,671	352
613019	AK	OTZ TEL COOPERATIVE	3,589	15,158,168	352
511595	WY	UTC OF THE WEST-WY	6,343	26,645,311	350
250315	AL	PINE BELT TEL CO	2,654	11,141,713	350
361405	MN	HILLS TEL CO, INC	610	2,555,541	349
472225	ID	CENTURYTEL OF IDAHO	3,832	16,046,883	349
462201	CO	RICO TEL CO	194	810,483	348
552349	NV	CHURCHILL-CC COMM.	12,879	53,742,700	348
411957	KS	EMBARQ MO-KS	5,052	21,059,583	347
432032	OK	VALLIANT TEL CO	2,019	8,413,650	347
280466	MS	SLEDGE TEL CO	529	2,199,263	346
371557	NE	HARTMAN TEL EXCH INC	481	1,994,410	346
330946	WI	SHARON TEL CO	1,132	4,687,147	345
250317	AL	ROANOKE TEL CO	5,051	20,844,270	344
553304	NV	HUMBOLDT TEL CO	1,065	4,390,712	344
140062	VT	PERKINSVILLE TEL CO	937	3,861,879	343
663800	GU	GTA TELECOM, LLC	62,640	256,891,894	342
452172	AZ	CITIZENS-FRNT-RURAL	96,891	396,978,257	341
341060	IL	MOULTRIE INDEPENDENT	697	2,845,913	340
401711	AR	CENTURYTEL-MTN HOME	20,382	82,997,985	339
472423	ID	INLAND TEL-ID	415	1,686,251	339
552348	NV	CENTEL OF NV	741,107	3,002,766,177	338
250285	AL	CASTLEBERRY TEL CO	979	3,943,390	336
472232	ID	DIRECT COMM-ROCKLAND	1,309	5,257,648	335
220369	GA	COMSOUTH TELECOMM	4,892	19,623,119	334
320783	IN	LIGONIER TEL CO	2,363	9,476,816	334
170192	PA	NORTH PENN TEL CO	5,344	21,431,229	334
482246	MT	MID-RIVERS TEL COOP	10,749	43,048,273	334
421912	MO	MCDONALD COUNTY TEL	4,158	16,634,385	333
190479	VA	VERIZON SOUTH-VA	36,969	147,316,852	332
454449	AZ	NAVAJO-AZ-FRONTIER	22,348	88,990,658	332
361381	MN	DUNNELL TEL CO	238	944,511	331
552223	NV	CENTURYTEL-GEM ST-NV	572	2,261,569	329
554431	NV	CITIZENS-FRONTIER-NV	22,534	88,780,013	328
453334	AZ	TABLE TOP TEL CO	4,872	19,146,007	327
472223	ID	CENTURY-GEM STATE-ID	1,569	6,158,441	327
250301	AL	FRONTIER-LAMAR CNTY (Av Sched)	2,123	8,329,839	327
250284	AL	BUTLER TEL CO	8,171	32,054,548	327
472227	ID	MUD LAKE TEL COOP	1,512	5,931,478	327
330963	WI	UTELCO, INC	15,357	60,082,344	326
391674	SD	ROBERTS COUNTY COOP	1,990	7,751,755	325
492259	NM	BACA VALLEY TEL CO	812	3,157,905	324
250318	AL	FRONTIER COMM-SOUTH	11,348	43,927,776	323
532399	OR	STAYTON COOP TEL CO	7,741	29,906,119	322
613020	AK	ACS-N SITKA	13,542	52,302,877	322
420463	MO	BPS Tel. Co.	3,642	14,040,342	321
371595	NE	UTC OF THE WEST-NE	22,314	85,680,819	320
431984	OK	OKLAHOMA COMM SYSTEM	18,585	71,279,221	320
552302	NV	VERIZON CALIF-NV	38,857	147,503,512	316

Incumbent LEC Study Area Average AMOU per Month

Study Area Code	State	Study Area Name	2006 USF Loops*	2006 Industry MOUSs*	2006 AMOUS/Loop/Mo
482249	MT	CENTURYTEL-MONTANA	57,020	216,288,853	316
472213	ID	ALBION TEL CO-ATC	4,565	17,266,300	315
542311	CA	CAL-ORE TELEPHONE CO	2,510	9,477,400	315
401729	AR	WALNUT HILL TEL CO	5,412	20,417,952	314
280452	MS	DELTA TEL CO	4,037	15,216,486	314
401713	AR	NORTH ARKANSAS TEL	7,508	28,270,359	314
330951	WI	SOMERSET TEL CO	2,984	11,198,905	313
270431	LA	CENTURYTEL-NW LA	8,846	33,193,004	313
482254	MT	SOUTHERN MONTANA TEL	1,015	3,801,453	312
320800	IN	NORTHWESTERN INDIANA	13,175	49,290,888	312
250299	AL	HAYNEVILLE TEL CO	2,417	9,034,907	312
259788	AL	CENTURYTEL-AL-SOUTH	134,936	504,140,518	311
411814	KS	PEOPLES TELECOM LLC	1,565	5,846,714	311
512251	WY	RANGE TEL COOP - WY	18,466	68,815,876	311
401699	AR	DECATUR TEL CO INC	1,222	4,536,807	309
411842	KS	UTC OF KANSAS	48,821	181,207,396	309
341091	IL	WOODHULL TEL CO	639	2,364,860	308
250282	AL	BLOUNTSVILLE TEL CO	3,491	12,897,378	308
421759	MO	CRAW-KAN TEL COOP-MO	2,534	9,342,791	307
190220	VA	BURKE'S GARDEN TEL	162	596,709	307
462208	CO	CENTURYTEL-COLORADO	10,694	39,367,544	307
411818	KS	CRAW-KAN TEL COOP	13,226	48,604,018	306
240544	SC	ST STEPHEN TEL CO	5,156	18,932,564	306
401143	AR	CENTURYTEL NW-AR-SIL	18,760	68,797,968	306
341079	IL	FRONTIER-SCHUYLER	2,718	9,958,813	305
482251	MT	RANGE TEL COOP-MT	4,756	17,425,105	305
492270	NM	PENASCO VALLEY TEL	3,291	12,041,670	305
492263	NM	LA JICARITA RURAL	2,245	8,213,645	305
190250	VA	SHENANDOAH TEL CO	25,394	92,847,744	305
351291	IA	SCHALLER TEL CO	1,820	6,647,890	304
330920	WI	NIAGARA TEL CO	4,454	16,268,038	304
462178	CO	AGATE MUTUAL TEL CO	138	503,819	304
330950	WI	CENTURYTEL-NW WI	18,718	68,322,847	304
190219	VA	BUGGS ISLAND COOP	4,265	15,562,317	304
170191	PA	NORTH EASTERN PA TEL	11,657	42,523,231	304
290580	TN	CTZENS-FRNTR-VOL ST	20,736	75,591,426	304
140069	VT	WAITSFIELD/FAYSTON	20,564	74,916,811	304
283301	MS	SOUTHEAST MS TEL CO	3,931	14,309,287	303
371542	NE	EASTERN NEBRASKA TEL	3,211	11,665,672	303
482241	MT	HOT SPRINGS TEL CO	856	3,104,259	302
613023	AK	UNITED UTILITIES INC	12,482	45,257,890	302
383303	ND	SRT COMMUNICATIONS	37,605	136,172,430	302
351168	IA	FARMERS MUTUAL COOP	1,818	6,580,843	302
515108	WY	QWEST CORP-WY	203,026	734,220,059	301
280458	MS	CENTURYTEL - N. MISS	23,101	83,385,889	301
240506	SC	UTC OF THE CAROLINAS	86,363	311,024,438	300
613010	AK	ACS-N GLACIER STATE	50,210	180,450,452	299
411785	KS	J. B. N. TEL CO INC	2,590	9,296,947	299
250314	AL	PEOPLES TEL CO	15,779	56,429,025	298
552233	NV	RURAL TEL CO - NV	1,075	3,844,055	298
391689	SD	WEST RIVER COOP	3,758	13,431,679	298
200259	WV	HARDY TELECOM	3,776	13,492,317	298
482250	MT	PROJECT TEL CO	5,569	19,882,704	298
240528	SC	HORRY TEL COOP	93,706	334,419,879	297
371591	NE	SE NEBRASKA TEL CO	3,769	13,447,600	297
147332	VT	VERMONT TEL. CO-VT	20,925	74,534,183	297
432011	OK	OKLAHOMA WINDSTREAM	17,614	62,681,827	297
613006	AK	COPPER VALLEY TEL	5,462	19,430,725	296

Incumbent LEC Study Area Average AMOU per Month

Study Area Code	State	Study Area Name	2006 USF Loops*	2006 Industry MOUSs*	2006 AMOUS/Loop/Mo
150077	NY	CHAMPLAIN TEL CO	5,653	20,103,611	296
140064	VT	SHOREHAM TEL CO INC.	3,654	12,979,319	296
482248	MT	NORTHERN TEL COOP	1,564	5,549,655	296
492264	NM	LEACO RURAL TEL COOP	2,141	7,592,987	296
502283	UT	SKYLINE TELECOM	2,620	9,285,102	295
613013	AK	KETCHIKAN PUBLIC UT	9,230	32,699,564	295
143331	VT	FAIRPOINT-VT	6,313	22,365,149	295
300654	OH	RIDGEVILLE TEL CO	751	2,658,702	295
351206	IA	IAMO TEL CO - IA	399	1,412,162	295
330913	WI	CENTURYTEL MONROE	11,250	39,789,379	295
472416	ID	VERIZON N'WEST-ID	126,481	447,089,442	295
371530	NE	CONSOLIDATED TELCO	1,593	5,629,522	294
170149	PA	FRONTIER-BREEZEWOOD	4,093	14,449,068	294
310734	MI	WALDRON TEL CO	555	1,959,021	294
290557	TN	CENTURY-CLAIBORNE	9,118	32,183,927	294
522427	WA	LEWIS RIVER TEL CO	6,068	21,347,784	293
230491	NC	N.ST. dba N. ST.COMM	107,530	378,156,158	293
401691	AR	WINDSTREAM AR	97,631	341,650,224	292
411820	KS	RAINBOW TELECOM	1,838	6,426,141	291
132454	CT	THE WOODBURY TEL CO	21,090	73,702,569	291
270435	LA	NORTHEAST LOUISIANA	884	3,088,011	291
452176	AZ	VALLEY TEL COOP-AZ	7,741	27,033,957	291
482235	MT	BLACKFOOT TEL - BTC	8,084	28,224,464	291
230479	NC	VERIZON SOUTH-NC	156,118	544,870,702	291
401705	AR	CENTURYTEL- ARKANSAS	17,537	61,202,808	291
310678	MI	BLANCHARD TEL ASSN	1,328	4,631,819	291
190567	VA	UNITED INTER-MT-VA	94,311	328,666,098	290
432013	OK	OKLAHOMA TEL & TEL	2,022	7,040,401	290
371567	NE	KEYSTONE-ARTHUR TEL	541	1,881,417	290
230476	NC	WINDSTREAM NC	213,062	740,686,443	290
633201	PR	PUERTO RICO TEL CO	920,183	3,191,255,454	289
200271	WV	CITIZENS-FRONTIER-WV	26,665	92,250,991	288
411852	KS	ZENDA TEL COMPANY	193	667,443	288
381638	ND	MIDSTATE COMM.	1,080	3,729,366	288
421945	MO	SENECA TEL CO	3,257	11,235,179	287
210328	FL	VERIZON FLORIDA	1,788,134	6,160,976,209	287
472218	ID	CUSTER TEL COOP	2,382	8,201,169	287
310708	MI	LENNON TEL CO	1,310	4,507,834	287
290574	TN	CENTURYTEL-OOLTEWAH	8,197	28,169,520	286
401144	AR	CENTURYTEL-CENTRAL A	68,748	236,193,528	286
240541	SC	RIDGEWAY TEL CO	2,222	7,628,805	286
613015	AK	MATANUSKA TEL ASSOC	61,203	209,854,628	286
351229	IA	LOST NATION-ELWOOD	1,016	3,470,114	285
170277	PA	WEST SIDE TEL CO-PA	39	133,046	284
391650	SD	CITY OF BROOKINGS	12,930	44,093,023	284
522451	WA	WESTERN WAHIAKUM	1,233	4,203,921	284
240517	SC	WINDSTREAM SC	52,458	178,839,134	284
204338	WV	CITIZENS-FRONTIER-WV	36,469	124,311,661	284
330860	WI	CHEQUAMEGON COM COOP	8,791	29,939,311	284
240542	SC	ROCK HILL TEL CO	50,753	172,783,083	284
411808	KS	MOUNDRIDGE TEL CO	2,815	9,579,287	284
492262	NM	ENMR TEL COOP INC-NM	12,020	40,896,902	284
381607	ND	CONSOLIDATED TELCOM	7,811	26,560,880	283
341016	IL	GENESEO TEL CO	7,651	25,953,663	283
170177	PA	LACKAWAXEN TELECOM	3,899	13,220,896	283
533401	OR	CITIZENS-FRONTIER-OR	13,408	45,451,899	282
220365	GA	GLENWOOD TEL CO	982	3,324,146	282
412030	KS	TOTAH COMMUNICATIONS	1,272	4,294,383	281

Incumbent LEC Study Area Average AMOU per Month

Study Area Code	State	Study Area Name	2006 USF Loops*	2006 Industry MOUSs*	2006 AMOUS/Loop/Mo
341012	IL	FLAT ROCK TEL CO-OP	531	1,790,028	281
401709	AR	MADISON COUNTY TEL	3,871	13,016,245	280
330846	WI	BALDWIN TELECOM	4,503	15,135,582	280
522418	WA	PEND OREILLE TEL.	2,128	7,145,317	280
230500	NC	SERVICE TEL CO	1,240	4,162,543	280
341043	IL	LA HARPE TEL CO	959	3,218,646	280
123321	NH	MCTA, INC.	12,289	41,187,284	279
452174	AZ	SOUTHWESTERN TEL CO	4,682	15,673,709	279
482255	MT	3-RIVERS TEL COOP	20,095	67,096,244	278
341050	IL	MARSEILLES TEL CO	3,402	11,348,749	278
120050	NH	WILTON TEL CO - NH	3,350	11,153,906	277
382247	ND	NEMONT TEL COOP - ND	9,089	30,219,605	277
371525	NE	THREE RIVER TELCO	1,286	4,266,615	276
491164	NM	WINDSTREAM SW-NM#1	40,698	134,852,883	276
492066	NM	DELL TEL CO-OP - NM	527	1,745,825	276
240546	SC	SANDHILL TEL COOP	16,442	54,466,132	276
522404	WA	ASOTIN TEL - WA	1,362	4,509,704	276
330944	WI	FRONTIER-ST.CROIX (Av Sched)	9,068	30,007,860	276
205050	WV	VERIZON W VA INC.	737,998	2,439,886,738	276
462187	CO	THE EL PASO CNTY TEL (ROR)	4,585	15,127,977	275
250298	AL	GULF TEL CO - AL	55,458	182,884,794	275
190233	VA	VERIZON S-VA(CONTEL)	555,422	1,829,544,479	274
330895	WI	CENTURYTEL-WISCONSIN	44,993	148,167,890	274
462196	CO	PEETZ COOP TEL CO	239	786,505	274
555173	NV	NEVADA BELL	345,745	1,137,515,296	274
421885	MO	WINDSTREAM MO	63,635	209,316,447	274
145115	VT	VERIZON VERMONT	322,138	1,059,176,894	274
462185	CO	CENTURYTEL OF EAGLE	76,525	251,486,265	274
300682	OH	FRONTIER-MI-OH	608	1,995,782	274
391659	SD	GOLDEN WEST TELECOMM	14,958	49,078,636	273
170195	PA	ARMSTRONG TEL NORTH	509	1,667,556	273
120039	NH	GRANITE STATE TEL	10,056	32,850,013	272
135200	CT	SOUTHERN NEW ENGLAND	1,833,313	5,985,909,238	272
391664	SD	JAMES VALLEY COOP	3,910	12,733,897	271
542321	CA	HAPPY VALLEY TEL CO	3,471	11,303,659	271
270436	LA	CENTURY NORTH LA	7,180	23,287,673	270
421936	MO	PEACE VALLEY TEL CO	538	1,743,645	270
391685	SD	VALLEY TELECOMM.	3,403	11,026,361	270
504429	UT	CITIZENS-FRONTIER-UT	21,893	70,884,476	270
381614	ND	POLAR TELECOMM.	2,145	6,942,985	270
462192	CO	BIG SANDY TELECOM	974	3,151,609	270
190254	VA	CENTEL OF VIRGINIA	275,322	889,933,200	269
482257	MT	TRIANGLE TEL COOP	10,935	35,332,714	269
492274	NM	CENTURYTEL SW-NM	5,888	19,024,848	269
170152	PA	FRONTIER-CANTON	4,048	13,070,238	269
270439	LA	CENTURYTEL-RINGGOLD	1,792	5,785,874	269
495105	NM	QWEST CORP-NM	733,152	2,365,138,291	269
361365	MN	CALLAWAY TEL CO	300	967,057	269
120043	NH	DUNBARTON TEL CO	1,729	5,571,611	269
502286	UT	SOUTH CENTRAL UTAH	14,081	45,359,266	268
452226	AZ	MIDVALE-AZ	1,424	4,585,322	268
482247	MT	NEMONT TEL COOP-MT	12,350	39,753,792	268
552353	NV	MOAPA VALLEY TEL CO.	3,982	12,783,705	268
103313	ME	NORTHLAND TEL CO-ME	23,299	74,749,048	267
462184	CO	DELTA COUNTY TEL CO	10,346	33,186,078	267
371558	NE	HEMINGFORD COOP TEL	868	2,783,977	267
532375	OR	ROOME TELECOMM INC	693	2,220,818	267
280456	MS	GEORGETOWN TEL CO	401	1,284,136	267

Incumbent LEC Study Area Average AMOU per Month

Study Area Code	State	Study Area Name	2006 USF Loops*	2006 Industry MOUSs*	2006 AMOUS/Loop/Mo
512296	WY	TRI COUNTY TEL ASSN	6,644	21,271,401	267
320819	IN	SE INDIANA RURAL	4,919	15,736,626	267
240526	SC	VERIZON S-SC(CONTEL)	20,460	65,432,534	267
250295	AL	GRACEBA TOTAL COMM	4,369	13,967,094	266
285184	MS	SO CENTRAL BELL-MS	1,100,881	3,516,914,588	266
310732	MI	UPPER PENINSULA TEL	6,124	19,562,015	266
230470	NC	CAROLINA TEL & TEL	982,268	3,134,856,342	266
532385	OR	MONROE TELEPHONE CO.	937	2,990,321	266
125113	NH	VERIZON NEWHAMPSHIRE	619,293	1,973,683,011	266
250312	AL	OTELCO TELEPHONE LLC	7,283	23,208,763	266
351320	IA	VAN HORNE COOP TEL	597	1,901,821	265
565010	DE	VERIZON DELAWARE INC	491,408	1,564,931,379	265
371565	NE	K & M TEL CO, INC	666	2,117,770	265
230509	NC	VERIZON S-NC(CONTEL)	136,993	435,536,096	265
351332	IA	WEST LIBERTY TEL CO	3,951	12,549,281	265
150128	NY	FRONTIER-SYLVAN LAKE	15,680	49,799,491	265
411761	KS	CUNNINGHAM TEL CO	1,329	4,217,404	264
454426	AZ	CITZENS-FRNTER-WH MT	39,104	123,988,973	264
391647	SD	CHEYENNE RIVER SIOUX	3,322	10,525,136	264
351269	IA	PALO COOP TEL ASSN	548	1,732,957	264
280454	MS	FRANKLIN TEL CO - MS	8,413	26,598,727	263
170193	PA	NORTH PITTSBURGH TEL	65,270	206,302,397	263
371518	NE	ELSIE COMM., INC.	205	646,980	263
494449	NM	NAVAJO-NM-FRONTIER	8,329	26,282,142	263
160138	NJ	UNITED TEL - NJ, INC	183,259	577,926,957	263
341092	IL	STELLE TEL CO	82	258,538	263
310714	MI	OGDEN TEL CO	429	1,352,115	263
320834	IN	WASHINGTON CTY RURAL	3,633	11,437,125	262
485104	MT	QWEST CORP-MT	284,363	894,501,148	262
465102	CO	QWEST CORP-CO	2,172,086	6,826,951,874	262
391679	SD	STOCKHOLM-STRANDBURG	694	2,176,602	261
210341	FL	EMBARQ FLORIDA	1,823,158	5,712,456,526	261
280457	MS	LAKESIDE TEL. CO.	357	1,118,320	261
250283	AL	BRINDLEE MOUNTAIN	11,525	36,094,914	261
475103	ID	QWEST CORP-ID	452,674	1,416,534,267	261
300634	OH	MINFORD TEL CO	3,207	10,031,592	261
340984	IL	CASS TEL CO	2,622	8,201,468	261
492265	NM	Tularosa Basin Tel.	4,868	15,223,705	261
421206	MO	IAMO TEL CO - MO	1,085	3,392,115	261
474427	ID	CITIZENS-FRONTIER-ID	21,308	66,592,788	260
452302	AZ	VERIZON CALIF-AZ	7,808	24,394,724	260
431704	OK	LAVACA TEL CO-OK	1,298	4,054,107	260
259789	AL	CENTURYTEL-AL-NORTH	112,431	350,883,800	260
180216	MD	ARMSTRONG TEL OF MD	7,132	22,236,867	260
455101	AZ	QWEST CORP-AZ	2,045,772	6,372,116,935	260
375143	NE	QWEST CORP-NE	312,844	973,992,592	259
421929	MO	HOLWAY TEL CO	548	1,702,770	259
472221	ID	FARMERS MUTUAL TEL	3,655	11,346,639	259
300651	OH	PATTERSONVILLE TEL	411	1,275,028	259
613003	AK	BRISTOL BAY TEL COOP	1,682	5,208,893	258
462210	CO	WILLARD TEL CO	64	198,049	258
522452	WA	WHIDBEY TEL CO.	13,217	40,855,596	258
391671	SD	WEST RIVER(MOBRIDGE)	2,459	7,594,868	257
450815	AZ	HOPPI TELECOMM, INC.	1,763	5,437,391	257
310728	MI	SPRINGPORT TEL CO	1,833	5,649,973	257
100010	ME	HAMPDEN TEL CO	3,279	10,106,324	257
310717	MI	ONTONAGON COUNTY TEL	3,962	12,206,300	257
200257	WV	SPRUCE KNOB SENECA	1,135	3,495,424	257

Incumbent LEC Study Area Average AMOU per Month

Study Area Code	State	Study Area Name	2006 USF Loops*	2006 Industry MOUSs*	2006 AMOUS/Loop/Mo
150100	NY	FRONTIER COMM OF NY	64,793	199,249,570	256
330889	WI	HAGER TELECOM INC.	2,010	6,172,283	256
431980	OK	CHICKASAW TEL CO	8,185	25,113,791	256
223036	GA	GEORGIA WINDSTREAM	90,211	276,739,912	256
532361	OR	CENTURYTEL-OREGON	67,855	208,117,564	256
462203	CO	RYE TELEPHONE CO	2,431	7,452,930	255
260421	KY	WEST KENTUCKY RURAL	16,755	51,340,725	255
421890	MO	GREEN HILLS TEL CORP	3,535	10,828,895	255
421807	MO	MOKAN DIAL INC-MO	844	2,582,509	255
220364	GA	WINDSTREAM GA TEL.	7,004	21,424,618	255
351252	IA	MUTUAL TEL CO	5,339	16,329,161	255
371536	NE	CURTIS TEL CO	812	2,475,592	254
371532	NE	CONSOLIDATED TEL CO	2,943	8,970,930	254
613018	AK	NUSHAGAK ELEC & TEL	2,523	7,689,352	254
462193	CO	NUCLA-NATURITA TEL	1,796	5,473,123	254
461835	CO	SUNFLOWER TEL - CO	327	994,982	254
210318	FL	FRONTIER COMM-SOUTH	4,197	12,768,725	254
411317	KS	UNITED OF EASTERN KS	48,769	148,352,495	253
522400	WA	UTC OF THE NW-WA	73,659	223,947,654	253
240551	SC	WILLISTON TEL CO	5,109	15,530,556	253
330856	WI	BURLINGTON B&W	3,569	10,845,883	253
532376	OR	HELIX TEL CO.	300	911,291	253
300666	OH	WINDSTREAM W-RESERVE	168,209	510,846,683	253
120047	NH	MERRIMACK COUNTY TEL	7,799	23,684,387	253
310694	MI	FARMERS DBA CHAPIN	686	2,083,162	253
250306	AL	FRONTIER COMM.-AL	12,671	38,472,394	253
330953	WI	SPRING VALLEY TEL CO	1,179	3,579,594	253
472222	ID	Fremont Telcom	5,115	15,529,519	253
429787	MO	CENTURYTEL-MO SW	204,363	620,445,624	253
310711	MI	MIDWAY TEL CO	879	2,668,183	253
401726	AR	TRI-COUNTY TEL CO-AR	6,825	20,695,078	253
429784	MO	CENTURYTEL-MO CEN	76,328	230,375,033	252
431965	OK	WINDSTREAM OK	13,910	41,956,808	251
405211	AR	SOUTHWESTERN BELL-AR	837,953	2,527,326,302	251
320832	IN	UTC OF INDIANA	219,924	663,266,969	251
429786	MO	CENTURYTEL-MO SOUTH	23,495	70,847,668	251
270423	LA	CENTURYTEL-CENTR LA	17,862	53,843,322	251
421942	MO	ROCK PORT TEL CO	1,816	5,473,427	251
351126	IA	CenturyTel-Chester	189	569,504	251
240479	SC	VERIZON SOUTH-SC	137,347	413,803,363	251
290280	TN	ARDMORE TEL CO	9,881	29,749,773	251
200277	WV	WEST SIDE TEL-WV	2,631	7,917,415	251
351301	IA	SOUTHWEST TEL EXCH	732	2,201,210	251
240520	SC	FARMERS TEL COOP	55,089	165,639,849	251
320742	IN	BLOOMINGDALE HOME	592	1,779,222	250
351096	IA	HEARTLND-HICKORYTECH	12,265	36,844,973	250
442170	TX	XIT RURAL TEL CO-OP	1,487	4,465,745	250
250290	AL	FARMERS TELECOM COOP	18,341	55,057,208	250
260398	KY	BRANDENBURG TEL CO	26,296	78,851,281	250
431974	OK	CANADIAN VALLEY TEL	1,273	3,813,042	250
330902	WI	LUCK TEL CO	2,412	7,220,824	249
432025	OK	SW OKLAHOMA TEL CO	792	2,369,906	249
330958	WI	TENNEY TEL CO	1,128	3,372,108	249
330879	WI	FARMERS INDEPENDENT	3,450	10,306,056	249
330936	WI	INDIANHEAD TEL CO	2,206	6,578,195	248
431985	OK	CROSS TEL CO	9,573	28,546,133	248
431788	OK	KANOKLA TEL ASSN-OK	1,208	3,600,344	248
294336	TN	CITIZENS-FRONTIER-TN	67,498	201,081,473	248

Incumbent LEC Study Area Average AMOU per Month

Study Area Code	State	Study Area Name	2006 USF Loops*	2006 Industry MOUSs*	2006 AMOUS/Loop/Mo
330971	WI	W. WISCONSIN TELCOM	6,310	18,793,829	248
381611	ND	DICKEY RURAL COOP	10,864	32,335,578	248
395145	SD	QWEST CORP-SD	165,310	491,479,914	248
491193	NM	WINDSTREAM SW-NM#2	43,993	130,672,409	248
290573	TN	NORTH CENTRAL COOP	22,121	65,705,706	248
341026	IL	HARRISONVILLE TEL CO	19,856	58,930,683	247
170201	PA	VERIZON N-PA(QUAKER)	48,129	142,691,234	247
532397	OR	SCIO MUTUAL TEL ASSN	1,752	5,193,117	247
411817	KS	PIONEER TEL ASSN INC	14,544	43,097,747	247
401702	AR	SOUTH ARKANSAS TEL	3,649	10,798,912	247
361491	MN	TWIN VALLEY-ULEN TEL	3,395	10,032,708	246
483310	MT	CENTRAL MONTANA	7,984	23,584,717	246
613000	AK	ACS OF ANCHORAGE	115,592	340,907,710	246
260406	KY	FOOTHILLS RURAL COOP	16,559	48,767,458	245
330865	WI	CLEAR LAKE TEL CO-WI	1,620	4,767,672	245
250300	AL	HOPPER TELECOMM. CO.	3,473	10,215,426	245
225192	GA	SOUTHERN BELL-GA	3,340,992	9,822,492,554	245
371526	NE	CAMBRIDGE TEL CO -NE	1,301	3,824,110	245
270426	LA	CAMPTI-PLEASANT HILL	2,542	7,457,260	244
351169	IA	FARMERS MUTUAL COOP	530	1,554,567	244
613017	AK	ALASKA TEL CO	11,003	32,254,193	244
190237	VA	HIGHLAND TEL COOP	1,412	4,138,291	244
401733	AR	YELCOT TEL CO INC	3,727	10,920,614	244
421888	MO	GRAND RIVER MUT-MO	13,958	40,870,200	244
532400	OR	UTC OF THE NW - OR	64,657	189,316,488	244
401142	AR	CENTURYTEL NW-AR-RUS	99,101	289,981,682	244
230485	NC	MEBTEL, INC.	14,191	41,512,579	244
230494	NC	PINEVILLE TEL CO	1,840	5,373,443	243
351119	IA	CASEY MUTUAL TEL CO	434	1,266,747	243
300589	OH	BASCOM MUTUAL TEL CO	744	2,170,973	243
331155	WI	TELEPHONE USA OF WI	50,736	147,958,391	243
401692	AR	ARKANSAS TEL CO	8,341	24,323,529	243
371576	NE	NORTHEAST NEBRASKA	7,108	20,721,736	243
269690	KY	WINDSTREAM LEXINGTON	369,194	1,075,810,131	243
482252	MT	RONAN TEL CO	3,539	10,291,828	242
371574	NE	NEBRASKA CENTRAL TEL	7,899	22,961,632	242
290562	TN	DEKALB TEL COOP	19,689	57,138,951	242
411780	KS	HAVILAND TEL CO	3,593	10,425,407	242
361346	MN	ACE TEL ASSN-MN	11,137	32,282,109	242
240533	SC	MCCLELLANVILLE TEL	1,883	5,453,537	241
432022	OK	SALINA-SPAVINAW TEL	7,487	21,607,374	240
442114	TX	CENTEL OF TEXAS	174,722	504,132,730	240
330855	WI	BRUCE TEL CO, INC	1,688	4,868,332	240
432141	OK	SANTA ROSA TEL COOP	723	2,083,555	240
351326	IA	WALNUT TEL CO, INC	732	2,109,210	240
391654	SD	INTERSTATE TELECOMM.	14,110	40,643,257	240
280447	MS	BRUCE TEL CO - MS	2,990	8,606,699	240
330942	WI	RICHLAND-GRANT COOP	2,777	7,990,341	240
190238	VA	MGW TEL. CO. INC.	1,727	4,968,685	240
330842	WI	AMERY TELCOM, INC.	6,969	20,046,803	240
223037	GA	WINDSTREAM GA COMM	297,318	854,605,019	240
230469	NC	BARNARDSVILLE TEL CO	1,486	4,268,058	239
411781	KS	H & B COMMUNICATIONS	904	2,595,951	239
351195	IA	GRISWOLD CO-OP TEL	1,966	5,642,432	239
170215	PA	YUKON - WALTZ TEL CO	883	2,533,945	239
220324	GA	VALLEY TEL CO, LLC	4,147	11,892,901	239
351294	IA	SCRANTON TEL CO	527	1,510,844	239
542339	CA	THE SISKIYOU TEL CO	5,036	14,416,717	239

Incumbent LEC Study Area Average AMOU per Month

Study Area Code	State	Study Area Name	2006 USF Loops*	2006 Industry MOUSs*	2006 AMOUS/Loop/Mo
150109	NY	WINDSTREAM-JAMESTOWN	37,603	107,628,066	239
411782	KS	HOME TEL CO	1,959	5,604,498	238
250286	AL	NATIONAL OF ALABAMA	2,052	5,868,287	238
381632	ND	RESERVATION TEL COOP	8,813	25,203,146	238
220392	GA	WAVERLY HALL, LLC	1,514	4,328,145	238
462194	CO	NUNN TEL CO	716	2,046,715	238
245194	SC	SOUTHERN BELL-SC	1,212,865	3,465,793,828	238
185030	MD	VERIZON MARYLAND INC	3,273,534	9,348,899,557	238
150084	NY	TACONIC TEL CORP	28,061	80,040,318	238
381617	ND	MIDSTATE TEL CO	1,808	5,154,766	238
280461	MS	NOXAPATER TEL CO	985	2,807,172	237
415214	KS	SOUTHWESTERN BELL-KS	963,488	2,743,692,678	237
361654	MN	INTERSTATE TELECOMM.	1,654	4,705,505	237
290575	TN	TENNESSEE TEL CO	63,855	181,552,156	237
411764	KS	ELKHART TEL CO INC	1,506	4,280,753	237
575020	DC	VERIZON WA, DC INC.	724,194	2,057,223,029	237
442141	TX	SANTA ROSA TEL COOP	2,063	5,860,265	237
260413	KY	LOGAN TEL. COOP. INC	6,476	18,395,375	237
522437	WA	PIONEER TEL CO	857	2,434,016	237
462199	CO	PLAINS COOP TEL ASSN	1,459	4,140,813	237
351424	IA	MABEL COOP TEL-IA	977	2,772,437	236
240516	SC	CHESTER TEL CO - SC	16,528	46,869,505	236
100003	ME	LINCOLNVILLE TEL CO	13,537	38,382,446	236
150108	NY	NICHOLVILLE TEL CO	2,415	6,843,822	236
391686	SD	VIVIAN TELEPHONE CO	18,000	50,926,887	236
411839	KS	TRI-COUNTY TEL ASSN	3,246	9,180,307	236
401722	AR	E RITTER TEL CO	4,211	11,899,081	235
120049	NH	UNION TEL CO	7,532	21,264,206	235
100029	ME	UNITY TEL CO., INC.	4,715	13,306,631	235
472220	ID	FILER MUTUAL TEL -ID	2,011	5,674,815	235
532393	OR	PIONEER TEL COOP	15,011	42,356,885	235
502279	UT	GUNNISON TEL CO	1,688	4,762,782	235
432008	OK	MEDICINE PARK TEL CO	783	2,207,354	235
270438	LA	RESERVE TEL CO	5,026	14,161,621	235
502287	UT	UBTA-UBET COMM INC.	19,330	54,439,070	235
275183	LA	SO CENTRAL BELL-LA	1,736,929	4,888,303,081	235
340993	IL	CROSSVILLE TEL CO	580	1,632,024	234
210336	FL	WINDSTREAM FL	90,434	254,359,778	234
341049	IL	MADISON TEL CO	4,926	13,849,540	234
230471	NC	CENTEL OF NC	223,488	627,754,999	234
200256	WV	ARMSTRONG OF WV	3,023	8,486,818	234
260408	KY	GEARHEART-COALFIELDS	6,593	18,499,274	234
391405	SD	HILLS TEL CO-SD	517	1,450,168	234
442066	TX	DELL TEL. CO-OP - TX	783	2,195,504	234
500758	UT	DIRECTCOMM-CEDAR VAL	2,677	7,496,852	233
270442	LA	CENTURYTEL-SW LA	5,606	15,686,069	233
220381	GA	PUBLIC SERVICE TEL	11,601	32,447,479	233
100034	ME	WEST PENOBSCOT TEL	2,565	7,172,430	233
462197	CO	PHILLIPS COUNTY TEL	1,915	5,352,842	233
391642	SD	ALLIANCE-BALTIC	3,105	8,679,041	233
381631	ND	RED RIVER RURAL TEL	4,790	13,387,833	233
250302	AL	WINDSTREAM AL	27,998	78,223,585	233
462198	CO	PINE DRIVE TEL CO	959	2,679,117	233
195040	VA	VERIZON VIRGINIA INC	2,786,643	7,779,159,968	233
361403	MN	FEDERATED UTILITIES	851	2,375,526	233
215191	FL	SOUTHERN BELL-FL	5,418,932	15,117,147,780	232
320775	IN	HANCOCK TELECOM	8,319	23,192,937	232
290566	TN	HUMPHREY'S COUNTY	1,783	4,970,738	232

Incumbent LEC Study Area Average AMOU per Month

Study Area Code	State	Study Area Name	2006 USF Loops*	2006 Industry MOUSs*	2006 AMOUS/Loop/Mo
230473	NC	CITIZENS TEL CO	21,159	58,933,453	232
421864	MO	CHARITON VALLEY TEL	7,533	20,978,199	232
210338	FL	QUINCY TEL CO-FL DIV	13,551	37,727,918	232
100011	ME	HARTLAND & ST ALBANS	3,950	10,967,079	231
230502	NC	STAR MEMBERSHIP CORP	18,755	52,042,447	231
170209	PA	UTC OF PENNSYLVANIA	338,632	939,318,723	231
431165	OK	WINDSTREAM SW-OK	82,967	230,050,519	231
542344	CA	VERIZON W-COAST-CA	13,671	37,878,559	231
140053	VT	FRANKLIN TEL CO - VT	906	2,510,002	231
100031	ME	WARREN TEL CO	1,860	5,152,954	231
351271	IA	PANORA COMM COOP	1,980	5,482,354	231
320772	IN	VERIZON N-IN	644,856	1,784,149,002	231
421957	MO	EMBARQ MISSOURI	206,170	570,370,225	231
341020	IL	GRAFTON TEL CO	911	2,519,351	230
421914	MO	MARK TWAIN RURAL TEL	4,256	11,768,131	230
391682	SD	TRI-COUNTY TELCOM	424	1,171,918	230
240550	SC	WEST CAROLINA RURAL	11,679	32,269,460	230
371524	NE	BLAIR TEL CO	7,722	21,311,751	230
260418	KY	SOUTH CENTRAL RURAL	27,378	75,547,951	230
502277	UT	CENTRAL UTAH TEL INC	3,857	10,640,788	230
361367	MN	FRONTIER-MINNESOTA	107,276	295,487,059	230
320751	IN	CITIZENS TEL CORP	2,425	6,672,514	229
100022	ME	SACO RIVER TEL & TEL	8,888	24,452,583	229
250305	AL	MON-CRE TEL COOP	2,976	8,183,186	229
150085	NY	CROWN POINT TEL CORP	1,126	3,090,809	229
150104	NY	MARGARETVILLE TEL CO	4,375	12,005,670	229
522426	WA	KALAMA TEL CO	3,214	8,816,335	229
554432	NV	CITIZENS-FRONTIER-NV	2,424	6,640,771	228
351344	IA	PRAIRIE TEL CO	1,015	2,778,294	228
100025	ME	STANDISH TEL CO	18,642	50,995,333	228
150089	NY	DEPOSIT TEL CO	8,550	23,386,035	228
351346	IA	ACE TEL ASSN-IA	4,649	12,715,929	228
290578	TN	TELLICO TEL CO	9,695	26,507,895	228
290567	TN	UNITED INTER-MT-TN	230,906	631,153,723	228
381616	ND	INTER-COMMUNITY TEL	2,549	6,966,834	228
502278	UT	EMRY dba EMRY TELCOM	15,070	41,176,854	228
220379	GA	PLANT TEL. CO.	9,656	26,380,494	228
310737	MI	WINN TEL CO	774	2,112,098	227
290552	TN	CENTURYTEL-ADAMSVILL	7,599	20,726,287	227
361389	MN	FARMERS MUTUAL TEL	1,114	3,036,285	227
442101	TX	CENTURYTEL-LK DALLAS	11,040	30,078,797	227
240538	SC	PIEDMONT RURAL COOP	12,972	35,298,416	227
341003	IL	EGYPTIAN COOP ASSN	3,196	8,694,908	227
351174	IA	FARMERS MUTUAL TEL	1,111	3,019,309	226
411788	KS	KANOKLA TEL ASSN-KS	2,251	6,113,110	226
505107	UT	QWEST CORP-UT	884,440	2,401,878,662	226
401734	AR	ARKWEST COMM., INC.	5,213	14,144,928	226
100004	ME	CHINA TEL CO.	3,331	9,025,708	226
220357	GA	WINDSTREAM GA	67,929	184,030,868	226
150071	NY	ARMSTRONG TEL CO-NY	3,604	9,761,573	226
154533	NY	CITIZENS-FRONTIER-NY	14,883	40,273,391	225
535163	OR	QWEST CORP-OR	1,117,663	3,024,243,539	225
522453	WA	YCOM NETWORKS, INC.	12,751	34,481,521	225
115112	MA	VERIZON MASS.	3,228,285	8,729,044,748	225
255181	AL	SO CENTRAL BELL-AL	1,617,991	4,371,910,084	225
300645	OH	OAKWOOD TEL CO	1,185	3,200,752	225
265182	KY	SO CENTRAL BELL-KY	971,468	2,621,198,090	225
280453	MS	WINDSTREAM MS	11,709	31,569,131	225

Incumbent LEC Study Area Average AMOU per Month

Study Area Code	State	Study Area Name	2006 USF Loops*	2006 Industry MOUSs*	2006 AMOUS/Loop/Mo
260419	KY	THACKER/GRIGSBY TEL	7,936	21,393,960	225
270440	LA	CENTURYTEL - EAST LA	3,139	8,459,492	225
532416	OR	VERIZON N'WEST-OR	380,924	1,025,322,144	224
653700	MP	MICRONESIAN TELECOMM	20,926	56,261,254	224
522408	WA	CENTURYTEL-WASHINGTO	160,369	431,158,428	224
310703	MI	KALEVA TEL CO	2,288	6,150,779	224
170200	PA	PYMATUNING IND TEL	2,274	6,110,286	224
290570	TN	LORETTO TEL CO	5,801	15,584,724	224
351888	IA	GRAND RIVER MUT-IA	7,944	21,339,951	224
371597	NE	WAUNETA TEL CO	636	1,707,188	224
150099	NY	HANCOCK TEL CO	1,801	4,833,411	224
391640	SD	ARMOUR INDEPENDENT	1,589	4,264,123	224
150121	NY	FRONTIER-ROCHESTER	340,968	912,518,520	223
623100	HI	HAWAIIAN TELCOM, INC	586,201	1,568,762,708	223
361450	MN	PARK REGION MUTUAL	4,543	12,148,360	223
295185	TN	SO. CENTRAL BELL -TN	2,159,372	5,774,179,751	223
220347	GA	BRANTLEY TEL CO	6,052	16,175,670	223
300606	OH	CONNEAUT TEL CO	6,991	18,671,072	223
341025	IL	SHAWNEE TELEPHONE CO	4,529	12,095,299	223
431976	OK	CARNEGIE TEL CO INC	1,483	3,958,554	222
230468	NC	ATLANTIC MEMBERSHIP	42,813	114,265,900	222
310691	MI	DEERFIELD FARMERS	2,405	6,413,055	222
269691	KY	WINDSTREAM LONDON	97,269	259,176,058	222
190243	VA	PEMBROKE TEL COOP	2,880	7,670,189	222
442147	TX	WINDSTREAM SUGARLAND	68,966	183,626,645	222
330861	WI	CHIBARDUN TEL COOP	5,749	15,297,301	222
310735	MI	WESTPHALIA TEL CO	1,072	2,851,062	222
351273	IA	PEOPLES TEL CO - IA	799	2,124,216	222
330866	WI	COCHRANE COOP TEL CO	1,303	3,461,762	221
260401	KY	DUO COUNTY TEL COOP	13,048	34,654,346	221
240536	SC	PALMETTO RURAL COOP	14,661	38,925,059	221
435215	OK	SOUTHWESTERN BELL-OK	1,227,273	3,256,532,020	221
522442	WA	ST JOHN TEL CO	645	1,710,580	221
341062	IL	NEW WINDSOR TEL CO	571	1,510,650	220
235193	NC	SOUTHERN BELL-NC	1,945,627	5,144,083,951	220
330910	WI	MILLTOWN MUTUAL TEL	2,574	6,802,845	220
613008	AK	ACS-FAIRBANKS, INC.	35,451	93,644,526	220
330924	WI	CENTURYTEL-MW-KENDAL	74,092	195,479,303	220
154534	NY	CITIZENS-FRONTIER-NY	25,238	66,531,665	220
381637	ND	W. RIVER TELECOM.	15,972	42,074,282	220
522416	WA	VERIZON N'WEST-WA	618,245	1,627,738,408	219
432020	OK	POTTAWATOMIE TEL CO	2,492	6,560,395	219
200267	WV	ARMSTRONG TEL. CO.	4,537	11,939,236	219
320790	IN	MONON TEL CO	1,356	3,567,148	219
240531	SC	LANCASTER TEL CO	25,032	65,839,856	219
411835	KS	SUNFLOWER TEL CO	5,010	13,167,927	219
421151	MO	SPECTRA COMM. GROUP	116,813	306,361,062	219
391680	SD	VENTURE COMM. COOP	13,336	34,975,028	219
532373	OR	GERVAIS TELEPHONE CO	1,007	2,640,825	219
355141	IA	QWEST CORP-IA	862,668	2,262,148,155	219
351205	IA	HUXLEY COMM. COOP.	1,693	4,434,622	218
457991	AZ	SADDLEBACK COMM CO	3,603	9,436,461	218
361404	MN	HARMONY TEL CO	977	2,558,288	218
330959	WI	CENTURYTEL-MW-WI(THORP)	2,217	5,804,665	218
150079	NY	CHAZY & WESTPORT	3,738	9,784,937	218
351127	IA	FRONTIER IOWA	49,050	128,370,020	218
431994	OK	GRAND TEL CO INC	3,946	10,322,427	218
165120	NJ	VERIZON NEW JERSEY	4,856,793	12,704,953,151	218

Incumbent LEC Study Area Average AMOU per Month

Study Area Code	State	Study Area Name	2006 USF Loops*	2006 Industry MOUSs*	2006 AMOUS/Loop/Mo
341065	IL	ODIN TEL EXCH INC	3,352	8,765,371	218
100005	ME	COBBOSSEECONTEE TEL	788	2,060,200	218
341088	IL	WABASH TEL COOP, INC	4,710	12,311,750	218
371562	NE	CONSOLIDATED TELECOM	1,193	3,117,143	218
425213	MO	SOUTHWESTERN BELL-MO	2,114,009	5,523,600,516	218
150073	NY	BERKSHIRE TEL CORP	6,233	16,274,174	218
150078	NY	CHAUTAUQUA & ERIE	10,192	26,604,318	218
585114	RI	VERIZON RHODE ISLAND	380,875	993,938,528	217
280446	MS	BAY SPRINGS TEL CO	11,316	29,486,913	217
371577	NE	GREAT PLAINS COMMUN	29,682	77,276,184	217
421887	MO	GRANBY TEL CO - MO	2,552	6,640,306	217
525161	WA	QWEST CORP-WA	1,972,653	5,132,168,165	217
532371	OR	CASCADE UTIL INC	8,959	23,282,489	217
260396	KY	BALLARD RURAL COOP	6,204	16,103,275	216
300586	OH	THE ARTHUR MUTUAL	1,273	3,304,104	216
411827	KS	S & T TEL COOP ASSN	2,714	7,040,791	216
340978	IL	ALHAMBRA-GRANTFORK	1,165	3,020,974	216
305062	OH	CINCINNATI BELL-OH	629,796	1,632,520,246	216
351125	IA	CENTRAL SCOTT TEL CO	5,662	14,639,394	215
522423	WA	INLAND TEL CO -WA	2,838	7,334,108	215
220375	GA	NELSON-BALL GROUND	7,603	19,647,853	215
411801	KS	MADISON TEL., LLC	686	1,772,131	215
411807	KS	MOKAN DIAL INC-KS	3,735	9,643,790	215
260414	KY	MOUNTAIN RURAL COOP	16,597	42,837,909	215
170204	PA	SOUTH CANAAN TEL CO	2,853	7,359,422	215
462209	CO	WIGGINS TEL ASSOC	1,782	4,595,277	215
371516	NE	ARAPAHOE TEL CO	2,510	6,470,540	215
300661	OH	UTC OF OHIO	454,128	1,170,677,837	215
371586	NE	ROCK COUNTY TEL CO	916	2,358,979	215
361353	MN	CITY OF BARNESVILLE	1,230	3,164,220	214
310675	MI	BARAGA TEL CO	4,887	12,571,928	214
230478	NC	ELLERBE TEL CO	2,316	5,957,578	214
462186	CO	EASTERN SLOPE RURAL	5,079	13,064,031	214
280448	MS	CALHOUN CITY TEL CO	3,651	9,381,479	214
371582	NE	PLAINVIEW TEL CO	1,057	2,714,449	214
100027	ME	UNION RIVER TEL CO	1,406	3,605,630	214
300591	OH	BUCKLAND TEL. CO.	623	1,592,626	213
351343	IA	WYOMING MUTUAL TEL	623	1,591,487	213
220386	GA	WINDSTREAM STANDARD	80,604	205,871,399	213
340998	IL	FRONTIER-DEPUE (Av Sched)	571	1,457,390	213
341066	IL	ONEIDA TEL EXCHANGE	563	1,436,021	213
351324	IA	VILLISCA FARMERS TEL	1,129	2,878,387	212
341087	IL	VIOLA HOME TEL CO	706	1,799,782	212
421860	MO	ALMA COMM. CO.	367	934,652	212
442091	TX	ETS TEL. CO., INC.	11,575	29,475,501	212
310725	MI	SAND CREEK TEL CO	1,139	2,894,375	212
381604	ND	BEK COMM. COOP.	6,712	17,040,687	212
371561	NE	HERSHEY COOP TEL CO	709	1,799,402	211
330956	WI	CENTURYTEL-NORTH WI	13,269	33,663,465	211
361456	MN	EMBARQ MINNESOTA	152,550	386,935,059	211
431969	OK	BIXBY TEL CO	10,093	25,599,771	211
110037	MA	RICHMOND TEL CO	1,047	2,654,958	211
320779	IN	VERIZON N-IN(CONTEL)	177,686	450,528,718	211
351260	IA	NORTHWEST IOWA TEL	4,855	12,297,688	211
372455	NE	BENKELMAN TEL CO	1,191	3,014,785	211
270430	LA	ELIZABETH TEL CO	3,084	7,801,437	211
154532	NY	CITIZENS-FRONTIER-NY	238,463	602,588,737	211
522449	WA	VERIZON N'WEST-WA	82,608	208,688,502	211

Incumbent LEC Study Area Average AMOU per Month

Study Area Code	State	Study Area Name	2006 USF Loops*	2006 Industry MOUSs*	2006 AMOUS/Loop/Mo
220378	GA	PLANTERS RURAL COOP	9,655	24,366,192	210
105111	ME	VERIZON MAINE	594,367	1,499,837,379	210
330949	WI	SIREN TEL CO, INC	2,713	6,844,379	210
351149	IA	FARMERS (DEFIANCE)	273	688,433	210
210339	FL	GTC, INC.	33,501	84,399,070	210
190249	VA	ROANOKE & BOTETOURT	10,461	26,324,447	210
351270	IA	PALMER MUTUAL TEL CO	284	714,609	210
361385	MN	EAST OTTER TAIL TEL	17,135	43,110,494	210
391667	SD	KADOKA TELEPHONE CO	510	1,282,425	210
411845	KS	WAMEGO TEL CO INC	5,293	13,309,024	210
270433	LA	LAFOURCHE TEL CO	13,388	33,654,260	209
391660	SD	FT RANDALL-MT RUSHMR	6,320	15,882,917	209
421472	MO	FAIRPOINT MISSOURI	7,661	19,251,858	209
290581	TN	UTC OF TN	17,240	43,241,518	209
270427	LA	CENTURYTEL-CHATHAM	1,987	4,980,965	209
170197	PA	PENNSYLVANIA TEL CO	1,376	3,445,905	209
290579	TN	TWIN LAKES TEL COOP	37,607	94,154,313	209
431981	OK	CHOUTEAU TEL CO	3,171	7,932,021	208
442262	TX	ENMR TEL COOP-TX	870	2,175,670	208
361453	MN	PEOPLES TEL CO - MN	1,904	4,759,294	208
411849	KS	WILSON TEL CO INC	2,169	5,419,776	208
522410	WA	CENTURYTEL-COWICHE	1,984	4,948,157	208
313033	MI	VERIZON N-MI(ALLTEL)	47,624	118,746,974	208
330841	WI	CENTURYTEL-MW-WI(CENCOM)	26,209	65,345,867	208
340983	IL	CAMBRIDGE TEL CO -IL	1,612	4,016,006	208
341023	IL	GRIDLEY TEL CO	1,391	3,465,184	208
341055	IL	FRONTIER-MIDLAND	4,560	11,358,304	208
522446	WA	TENINO TELEPHONE CO	3,628	9,030,924	207
150097	NY	GERMANTOWN TEL CO	2,849	7,089,293	207
421931	MO	NE MISSOURI RURAL	7,725	19,216,902	207
190226	VA	NTELOS, INC.	33,024	82,024,646	207
472231	ID	PROJECT MUTUAL TEL	7,492	18,602,777	207
230503	NC	SURRY MEMBERSHIP	14,586	36,125,474	206
170175	PA	IRONTON TEL CO	5,323	13,180,283	206
341037	IL	IL CONSOLIDATED TEL	68,614	169,636,996	206
391669	SD	MCCOOK COOP TEL CO	2,146	5,303,563	206
150072	NY	FRONTIER-AUSABLE VAL	6,333	15,635,358	206
381622	ND	MOORE & LIBERTY TEL	968	2,387,540	206
170189	PA	ARMSTRONG TEL CO-PA	1,581	3,896,881	205
381625	ND	NORTHWEST COMM COOP	5,505	13,568,812	205
361501	MN	WEST CENTRAL TEL	3,913	9,643,705	205
442080	TX	GTE SW VERIZON-TX	1,264,606	3,114,764,483	205
240535	SC	NORWAY TEL CO	802	1,974,522	205
341036	IL	VERIZON N-IL(CONTEL)	109,604	269,814,479	205
381610	ND	DAKOTA CENTRAL COOP	4,795	11,795,295	205
532363	OR	CLEAR CREEK MUTUAL	3,566	8,770,804	205
361425	MN	CHRISTENSEN COMM CO	1,597	3,926,172	205
300588	OH	AYERSVILLE TEL CO	1,162	2,848,791	204
330941	WI	RHINELANDER-FRONTIER	1,288	3,157,173	204
371540	NE	DILLER TEL CO	895	2,192,991	204
385144	ND	QWEST CORP-ND	157,828	386,554,445	204
391652	SD	PRAIRIEWAVE COMM TEL	6,205	15,194,903	204
452169	AZ	SAN CARLOS APACHE	2,698	6,602,384	204
150125	NY	STATE TEL CO	7,994	19,555,029	204
351106	IA	ALPINE COMM.	6,042	14,774,815	204
210329	FL	GTC, INC.	10,411	25,458,044	204
240539	SC	PBT TELECOM, INC.	16,044	39,213,614	204
103315	ME	MID MAINE TELECOM	6,029	14,722,467	203

Incumbent LEC Study Area Average AMOU per Month

Study Area Code	State	Study Area Name	2006 USF Loops*	2006 Industry MOUSs*	2006 AMOUS/Loop/Mo
341183	IL	CITIZENS-FRONTIER-IL	91,258	222,763,177	203
351178	IA	ITS - IOWA TELECOM	73,099	178,409,029	203
150129	NY	TOWNSHIP TEL CO	4,107	10,019,994	203
371568	NE	WINDSTREAM NE	238,140	580,940,723	203
330917	WI	MT VERNON TEL CO	12,508	30,483,674	203
462206	CO	STONEHAM COOP TEL CO	77	187,653	203
341015	IL	VERIZON NORTH-IL	539,300	1,313,979,390	203
220389	GA	TRENTON TEL CO	6,798	16,540,687	203
300630	OH	CENTURYTEL OF OHIO	71,545	173,945,759	203
361395	MN	GARDEN VALLEY TEL CO	15,704	38,171,845	203
351141	IA	CORN BELT TEL CO	786	1,909,853	202
240527	SC	HOME TEL CO	23,121	56,175,110	202
462190	CO	HAXTUN TEL CO	1,589	3,853,980	202
381509	ND	WOLVERTON TEL CO	314	761,518	202
170196	PA	PALMERTON TEL CO	12,088	29,307,746	202
401720	AR	CENTURYTEL-REDFIELD	1,649	3,993,374	202
431988	OK	DOBSON TEL CO	4,081	9,874,693	202
150088	NY	DELHI TEL CO	4,498	10,881,423	202
351214	IA	KALONA COOP TEL CO	1,959	4,738,671	202
310685	MI	CHATHAM TEL CO - MI	2,922	7,064,221	201
260412	KY	LEWISPORT TEL CO	1,360	3,286,946	201
442166	TX	WEST TEXAS RURAL TEL	2,134	5,154,823	201
230501	NC	SKYLINE MEMBERSHIP	36,153	87,316,613	201
330912	WI	FRONTIER-MONDOVI	2,552	6,160,749	201
270429	LA	EAST ASCENSION TEL	35,933	86,742,205	201
532386	OR	MT. ANGEL TEL CO.	1,933	4,663,598	201
432018	OK	PIONEER TEL COOP INC	52,666	127,030,397	201
613012	AK	ACS-AK JUNEAU	21,957	52,957,010	201
442130	TX	PEOPLES TEL COOP -TX	13,329	32,123,550	201
421893	MO	CHOCTAW TELEPHONE CO	593	1,427,699	201
230483	NC	LEXCOM TELEPHONE CO.	28,767	69,249,180	201
345070	IL	ILLINOIS BELL TEL CO	5,453,444	13,110,444,734	200
220382	GA	RINGGOLD TEL CO	13,114	31,457,723	200
100015	ME	COMMUNITY SERVICE	11,236	26,946,965	200
532362	OR	CANBY TEL ASSN	10,957	26,277,204	200
170156	PA	CITIZENS - KECKSBURG	4,674	11,189,219	199
100024	ME	SOMERSET TEL CO	11,644	27,806,937	199
502288	UT	ALL WEST COMM-UT	6,537	15,595,673	199
341057	IL	GALLATIN RIVER COMM.	60,185	143,488,033	199
170170	PA	VERIZON N-PA(CONTEL)	58,642	139,796,474	199
401704	AR	LAVACA TEL CO-AR	1,550	3,692,279	199
351176	IA	FARMERS TEL CO-ESSEX	687	1,634,213	198
361445	MN	CENTURYTEL-MINNESOTA	27,186	64,633,926	198
351230	IA	NORTHEAST IOWA TEL	1,976	4,696,052	198
351167	IA	ITS-IOWA TELECOM-NO	100,725	239,293,553	198
310720	MI	PENINSULA TEL CO -MI	1,406	3,338,262	198
421949	MO	STEELVILLE TEL EXCH	4,596	10,892,702	198
290571	TN	MILLINGTON TEL CO	26,434	62,642,435	197
351237	IA	MARNE & ELK HORN TEL	1,525	3,613,463	197
330955	WI	STATE LONG DISTANCE	10,348	24,507,267	197
290554	TN	BLEDSON TEL COOP	12,678	30,006,771	197
300590	OH	BENTON RIDGE TEL CO	1,139	2,695,730	197
431977	OK	CENTRAL OKLAHOMA TEL	2,617	6,191,586	197
381615	ND	GRIGGS COUNTY TEL CO	1,985	4,691,510	197
330872	WI	CUBA CITY EXCHANGE	1,847	4,364,571	197
190217	VA	AMELIA TEL CORP	5,905	13,944,773	197
351280	IA	RINGSTED TEL CO	372	878,404	197
330886	WI	VERIZON NORTH-WI	331,192	781,092,891	197

Incumbent LEC Study Area Average AMOU per Month

Study Area Code	State	Study Area Name	2006 USF Loops*	2006 Industry MOUSs*	2006 AMOUS/Loop/Mo
330922	WI	CENTURYTEL-MW-WI/NW	70,035	165,136,913	196
170169	PA	VERIZON NORTH-PA	496,413	1,169,250,423	196
442104	TX	LAKE LIVINGSTON TEL	976	2,297,800	196
220344	GA	ALMA TEL CO	7,409	17,441,426	196
220355	GA	CITIZENS TEL CO - GA	4,850	11,404,793	196
432023	OK	SHIDLER TEL CO	911	2,140,966	196
330966	WI	VERNON TEL COOP	7,527	17,685,959	196
330938	WI	NORTHEAST TEL CO	8,955	21,012,318	196
341041	IL	KINSMAN MUTUAL TEL	93	218,164	195
230511	NC	YADKIN VALLEY TEL	29,840	69,976,939	195
310679	MI	BLOOMINGDALE TEL CO	2,004	4,698,399	195
442039	TX	BIG BEND TEL CO INC	5,645	13,234,704	195
432030	OK	TOTAH COMMUNICATIONS	2,278	5,337,302	195
320797	IN	NEW PARIS TEL INC	2,165	5,068,771	195
190244	VA	PEOPLES MUTUAL TEL	7,283	17,043,212	195
351239	IA	MASSENA TEL CO	637	1,490,297	195
330937	WI	PRICE COUNTY TEL CO	4,911	11,477,910	195
220395	GA	WINDSTREAM ACCUCOMM	4,246	9,920,613	195
140058	VT	LUDLOW TEL CO	5,127	11,969,613	195
100002	ME	OXFORD WEST TEL CO	6,962	16,211,573	194
361391	MN	FELTON TEL CO. INC.	688	1,601,801	194
290576	TN	PEOPLES TEL CO	5,247	12,203,948	194
351132	IA	CLEAR LAKE INDEPEND	5,932	13,775,940	194
351259	IA	NORTHERN IOWA TEL CO	2,361	5,478,520	193
371592	NE	STANTON TELECOM INC.	1,140	2,644,956	193
325080	IN	INDIANA BELL TEL CO	1,867,369	4,330,456,987	193
351285	IA	SAC COUNTY MUTUAL	1,038	2,407,112	193
343035	IL	VERIZON S-IL(ALLTEL)	29,373	68,112,977	193
100019	ME	OXFORD COUNTY TEL	6,243	14,471,877	193
310695	MI	VERIZON NORTH-MI	607,850	1,408,882,232	193
230474	NC	CONCORD TEL CO	107,989	250,247,422	193
351160	IA	FARMERS&BUSINESS MEN	1,106	2,562,585	193
170176	PA	WINDSTREAM PA	213,457	494,481,321	193
351179	IA	FENTON CO-OP TEL CO	327	757,415	193
452171	AZ	ARIZONA TELEPHONE CO	3,907	9,049,544	193
365142	MN	QWEST CORP-MN	1,658,043	3,839,025,895	193
361424	MN	MABEL COOP TEL - MN	776	1,794,098	193
371128	NE	CITIZENS-FRONTIER-NE	46,403	107,171,803	192
411777	KS	GOLDEN BELT TEL ASSN	5,664	13,078,751	192
401710	AR	MAGAZINE TEL CO	1,018	2,349,317	192
361443	MN	LORETEL SYSTEMS, INC	12,338	28,470,678	192
361123	MN	CITIZENS-FRONTIER-MN	121,365	279,890,562	192
522412	WA	ELLENSBURG TEL CO	20,125	46,383,284	192
421900	MO	KLM TEL CO	1,463	3,371,587	192
170210	PA	VENUS TEL CORP	1,369	3,151,928	192
240515	SC	CHESNEE TEL CO	5,148	11,852,528	192
361512	MN	WOLVERTON TEL CO	175	402,461	192
330918	WI	NELSON TEL COOP	4,082	9,386,264	192
150095	NY	FISHERS ISLAND TEL	1,045	2,400,481	191
330875	WI	DICKEYVILLE TEL CORP	1,194	2,742,007	191
391688	SD	WESTERN TEL CO.	1,109	2,541,037	191
532391	OR	PEOPLES TEL CO. - OR	1,387	3,177,210	191
361337	MN	WINNEBAGO COOP ASSN	777	1,778,136	191
613028	AK	SUMMIT TEL & TEL -AK	316	723,088	191
175000	PA	VERIZON PENNSYLVANIA	4,844,418	11,084,212,509	191
361479	MN	SCOTT RICE -INTEGRA	18,526	42,371,466	191
351107	IA	BALDWIN-NASHVILLE	325	743,178	191
310702	MI	CENTURYTEL MICHIGAN	50,823	116,193,624	191

Incumbent LEC Study Area Average AMOU per Month

Study Area Code	State	Study Area Name	2006 USF Loops*	2006 Industry MOUSs*	2006 AMOUS/Loop/Mo
371559	NE	HENDERSON CO-OP TEL	990	2,260,255	190
361505	MN	WIKSTROM TEL CO, INC	6,374	14,541,186	190
351262	IA	COMM 1 NETWORK	1,378	3,140,217	190
330960	WI	TRI-COUNTY COMM COOP	4,063	9,256,197	190
401718	AR	PRAIRIE GROVE TEL CO	9,550	21,749,530	190
270425	LA	CAMERON TEL CO - LA	5,824	13,263,213	190
220360	GA	ELLIJAY TEL CO	15,673	35,686,213	190
543402	CA	CITIZENS-FRNTIER-GST	15,363	34,969,552	190
542315	CA	GLOBAL VALLEY NETWKS	14,544	33,098,416	190
330974	WI	WOOD COUNTY TEL CO	25,121	57,117,535	189
351337	IA	WINNEBAGO COOP ASSN	6,497	14,759,690	189
381636	ND	UNITED TEL MUTUAL	11,850	26,913,296	189
260411	KY	LESLIE COUNTY TEL CO	9,090	20,636,146	189
190236	VA	NORTH RIVER TEL COOP	1,087	2,464,653	189
310676	MI	BARRY COUNTY TEL CO	5,712	12,932,637	189
391653	SD	CITY OF FAITH MUNIC	383	867,106	189
361390	MN	FEDERATED TEL COOP	2,177	4,926,585	189
260417	KY	SALEM TEL CO	2,110	4,773,338	189
462207	CO	STRASBURG TEL CO	1,931	4,368,031	189
287449	MS	MYRTLE TEL CO	833	1,881,550	188
391668	SD	KENNEBEC TEL CO	797	1,799,307	188
320747	IN	CENTURYTEL-CENTR IN	3,097	6,986,312	188
280460	MS	FRONTIER-MISSISSIPPI (Av Sched)	5,724	12,910,882	188
431995	OK	HINTON TEL CO	3,367	7,587,674	188
250316	AL	RAGLAND TEL CO	1,270	2,861,895	188
150106	NY	WINDSTREAM NY-FULTON	35,047	78,973,570	188
421920	MO	MILLER TEL CO - MO	1,009	2,273,460	188
445216	TX	SOUTHWESTERN BELL-TX	7,768,847	17,502,784,437	188
411809	KS	MUTUAL TEL CO	498	1,121,940	188
330844	WI	BADGER TELECOM, INC.	6,688	15,065,747	188
442071	TX	FIVE AREA TEL CO-OP	6,439	14,490,955	188
290565	TN	HIGHLAND TEL COOP-TN	26,670	60,006,911	187
381447	ND	NORTH DAKOTA TEL CO	17,622	39,638,082	187
361427	MN	MANKATO-HICKORYTECH	30,558	68,733,090	187
361401	MN	HALSTAD TEL CO	1,857	4,169,795	187
351246	IA	MINERVA VALLEY TEL	797	1,787,236	187
351334	IA	WESTERN IOWA ASSN	3,716	8,322,887	187
290553	TN	BEN LOMAND RURAL	34,983	78,352,351	187
351284	IA	RUTHVEN TEL EXCHANGE	750	1,679,563	187
411826	KS	RURAL TEL SERVICE CO	15,388	34,450,631	187
330915	WI	MOSINEE TEL CO	5,162	11,548,243	186
421935	MO	OREGON FARMERS MUT	1,107	2,475,988	186
351316	IA	UNITED FARMERS TEL	540	1,206,544	186
542301	CA	CALAVERAS TEL CO	4,469	9,982,347	186
341075	IL	REYNOLDS TEL CO, INC	525	1,172,622	186
150093	NY	EMPIRE TEL CORP	7,368	16,453,656	186
351170	IA	ITS-IOWA TELECOM-SYS	64,897	144,844,210	186
330973	WI	WITTENBERG TEL CO	2,483	5,541,250	186
280455	MS	FULTON TEL CO	7,774	17,342,643	186
341004	IL	EL PASO TEL CO	1,747	3,896,671	186
532396	OR	ST PAUL COOP ASSN	626	1,395,065	186
270434	LA	CENTURYTEL-EVANGELIN	33,189	73,931,859	186
230510	NC	WILKES MEMBERSHIP	11,329	25,216,882	185
341053	IL	METAMORA TEL CO	3,909	8,700,332	185
351251	IA	MEDIAPOLIS TEL CO	2,328	5,181,275	185
220394	GA	WILKES TEL & ELC CO	11,354	25,242,961	185
361357	MN	BLACKDUCK TEL CO	1,993	4,428,487	185
532384	OR	MONITOR COOP TEL	683	1,517,247	185

Incumbent LEC Study Area Average AMOU per Month

Study Area Code	State	Study Area Name	2006 USF Loops*	2006 Industry MOUSs*	2006 AMOUS/Loop/Mo
330970	WI	CENTURYTEL-MW-WI	6,278	13,932,362	185
542313	CA	DUCOR TELEPHONE CO	1,331	2,953,552	185
361507	MN	WINSTED TEL CO	1,579	3,499,437	185
381630	ND	POLAR COMM MUT AID	8,313	18,408,840	185
335220	WI	WISCONSIN BELL	1,565,061	3,462,933,434	184
391676	SD	SANTEL COMM. COOP.	4,825	10,675,260	184
300615	OH	VERIZON NORTH-OH	763,891	1,688,414,505	184
341086	IL	TONICA TEL CO	534	1,180,178	184
193029	VA	NEW CASTLE TEL. CO.	2,331	5,147,469	184
330863	WI	CITIZENS TEL COOP-WI	2,290	5,054,331	184
320777	IN	HOME CO OF PITTSBORO	2,717	5,994,595	184
150131	NY	TRUMANSBURG TEL CO.	6,259	13,800,628	184
442107	TX	LIVINGSTON TEL CO	7,986	17,584,335	183
305150	OH	OHIO BELL TEL CO	3,119,651	6,865,117,782	183
300665	OH	WINDSTREAM OH	118,137	259,961,265	183
320776	IN	COMM CORP OF INDIANA	10,873	23,905,486	183
290598	TN	WEST KY COOP-TN	1,776	3,902,300	183
371590	NE	SODTOWN TEL CO	89	195,378	183
155130	NY	VERIZON NEW YORK	8,210,556	18,022,470,253	183
265061	KY	CINCINNATI BELL-KY	184,324	404,512,932	183
210335	FL	NORTHEAST FLORIDA	10,086	22,128,906	183
431968	OK	BEGGS TEL CO	1,824	4,000,560	183
361408	MN	HOME TEL CO - MN	2,000	4,386,437	183
361485	MN	SPRING GROVE COOP	1,319	2,892,107	183
442084	TX	UTC OF TEXAS INC	147,558	323,503,459	183
351147	IA	DANVILLE MUTUAL TEL	939	2,057,521	183
120038	NH	BRETTON WOODS TEL CO	911	1,994,921	182
421927	MO	NEW FLORENCE TEL CO	458	1,002,362	182
331159	WI	CENTURYTEL-CENTRL WI	61,284	134,108,937	182
532377	OR	HOME TELEPHONE CO	803	1,756,742	182
330934	WI	CENTURYTEL-MW-WI(PLATTEVILLE)	8,904	19,474,679	182
351235	IA	FARMERS (MANILLA)	614	1,342,866	182
522447	WA	TOLEDO TELEPHONE CO	2,215	4,840,512	182
330940	WI	RHINELANDER-FRONTIER	13,873	30,307,975	182
421874	MO	ELLINGTON TEL CO	2,141	4,675,508	182
330908	WI	MARQUETTE-ADAMS COOP	3,975	8,677,378	182
442140	TX	CENTURYTEL-SAN MARCO	21,377	46,652,511	182
391677	SD	SIOUX VALLEY TEL. CO	5,143	11,213,310	182
330892	WI	HILLSBORO TEL CO	1,659	3,613,593	182
330967	WI	FRONTIER OF VIROQUA (Av Sched)	3,900	8,493,036	181
351114	IA	THE BURT TEL CO	423	920,622	181
401697	AR	CENTRAL ARKANSAS TEL	3,081	6,704,495	181
310682	MI	FRONTIER-MICHIGAN	22,631	49,222,118	181
391670	SD	MIDSTATE COMM., INC.	4,782	10,396,456	181
330880	WI	FARMERS TEL CO - WI	6,248	13,561,599	181
300613	OH	LITTLE MIAMI COMM.	2,757	5,976,841	181
351327	IA	WEBB-DICKENS TEL	405	877,787	181
220358	GA	DARIEN TEL CO	6,395	13,860,292	181
320801	IN	CENTURYTEL OF ODON	1,712	3,708,425	181
220346	GA	BLUE RIDGE TEL CO	12,607	27,278,943	180
310713	MI	HIAWATHA TEL CO	7,683	16,622,013	180
230505	NC	TRI COUNTY TEL MEMBR	3,352	7,241,246	180
371534	NE	COZAD TEL CO	2,572	5,547,769	180
544342	CA	CITIZENS-FRNTR-TUOLUM	6,778	14,610,340	180
310688	MI	CLIMAX TEL CO	1,389	2,993,295	180
542302	CA	VERIZON CA(CONTEL)	393,459	846,660,502	179
532364	OR	COLTON TEL CO	1,156	2,486,274	179
330868	WI	COON VALLEY FARMERS	2,381	5,118,964	179

Incumbent LEC Study Area Average AMOU per Month

Study Area Code	State	Study Area Name	2006 USF Loops*	2006 Industry MOUSs*	2006 AMOUS/Loop/Mo
351112	IA	BREDA TEL CORP.	1,120	2,406,763	179
351319	IA	VAN BUREN TEL CO	2,862	6,148,999	179
542346	CA	PINNACLES TEL CO	263	564,118	179
170168	PA	FRONTIER-PA	25,891	55,492,512	179
492272	NM	ROOSEVELT CNTY RURAL	2,060	4,412,223	178
351293	IA	SHARON TEL CO	1,139	2,433,346	178
361451	MN	PAUL BUNYAN RURAL	10,779	23,027,406	178
100020	ME	PINE TREE TEL & TEL	6,572	14,038,996	178
190239	VA	NEW HOPE TEL COOP	923	1,971,395	178
351310	IA	TITONKA TEL CO	546	1,166,155	178
452179	AZ	GILA RIVER TELECOM.	3,693	7,885,548	178
330909	WI	MIDWAY TEL CO	8,558	18,265,909	178
250311	AL	OAKMAN TEL CO (TDS)	2,382	5,083,251	178
310671	MI	CENTURYTEL MW-MI	25,681	54,724,200	178
391649	SD	BERESFORD MUNICIPAL	1,502	3,199,903	178
542318	CA	FORESTHILL TEL CO.	3,169	6,750,865	178
310672	MI	COMM CORP OF MI	4,257	9,060,051	177
351202	IA	HOSPERS TEL EXCH INC	742	1,578,813	177
421932	MO	LATHROP TEL COMPANY	1,521	3,236,233	177
502282	UT	MANTI TEL CO	3,141	6,683,104	177
371563	NE	HOOPER TEL CO	1,120	2,381,667	177
330930	WI	GRANTLAND TELECOM	3,745	7,961,148	177
351242	IA	MILES COOP TEL ASSN	700	1,487,619	177
351222	IA	LA MOTTE TEL CO	739	1,568,304	177
361386	MN	ECKLES TEL CO	4,784	10,151,882	177
351298	IA	SOUTH SLOPE COOP TEL	14,025	29,761,661	177
170185	PA	MARIANNA - SCENERY	2,423	5,139,077	177
542322	CA	HORNITOS TEL CO	640	1,355,403	176
320788	IN	MERCHANTS & FARMERS	514	1,088,507	176
150113	NY	WINDSTREAM RED JACKT	1,819	3,850,388	176
351146	IA	CUMBERLAND TEL CO	355	749,290	176
300618	OH	GERMANTOWN INDEPEND	3,916	8,251,586	176
341032	IL	HOME TEL CO-ST JACOB	1,031	2,171,101	175
361483	MN	SLEEPY EYE TEL CO	5,879	12,374,204	175
351110	IA	BERNARD TEL CO INC	498	1,047,468	175
150133	NY	VERNON TEL CO	2,543	5,343,538	175
351158	IA	MINBURN TELECOMM.	858	1,802,768	175
220376	GA	PEMBROKE TEL CO	4,215	8,854,158	175
401721	AR	RICE BELT TEL CO	850	1,785,458	175
230497	NC	PIEDMONT MEMBERSHIP	3,181	6,672,798	175
442109	TX	CONSOLIDATED COMM-TX	109,063	228,654,043	175
351134	IA	COLO TEL CO	692	1,448,680	174
351308	IA	TEMPLETON TEL CO	392	820,532	174
351175	IA	FARMERS TEL CO - BAT	386	807,248	174
320815	IN	ROCHESTER TEL CO	7,475	15,621,621	174
351305	IA	STRATFORD MUTUAL TEL	701	1,464,766	174
260415	KY	PEOPLES RURAL COOP	8,663	18,083,423	174
542334	CA	SUREWEST TEL.	121,615	253,822,729	174
442097	TX	WINDSTREAM KERRVILLE	23,043	48,091,673	174
100007	ME	ISLAND TEL CO	728	1,518,362	174
532387	OR	NEHALEM TELECOMM.	3,145	6,552,448	174
613025	AK	YUKON TEL CO INC	595	1,239,465	174
250308	AL	NEW HOPE TEL COOP	5,544	11,527,771	173
351098	IA	ARCADIA TEL CO	343	712,770	173
442086	TX	HILL COUNTRY CO-OP	17,120	35,569,869	173
421882	MO	FIDELITY TEL CO	15,378	31,918,929	173
371531	NE	CLARKS TELECOM CO.	921	1,909,519	173
411758	KS	COUNCIL GROVE TEL CO	1,923	3,983,205	173

Incumbent LEC Study Area Average AMOU per Month

Study Area Code	State	Study Area Name	2006 USF Loops*	2006 Industry MOUSs*	2006 AMOUS/Loop/Mo
330962	WI	UNION TEL CO	4,641	9,612,588	173
361358	MN	BLUE EARTH VALLEY	6,905	14,301,106	173
361431	MN	MIDWEST TEL CO	2,798	5,791,870	173
429785	MO	CENTURYTEL-MO BELLE	4,174	8,630,868	172
351129	IA	CITIZENS MUTUAL TEL	3,949	8,163,591	172
330891	WI	RHINELANDER-FRONTIER	5,344	11,040,430	172
351243	IA	MILLER TEL CO - IA	95	196,218	172
351189	IA	RIVER VALLEY TELECOM	931	1,921,822	172
351191	IA	GRAND MOUND COOP TEL	612	1,261,500	172
361448	MN	OSAKIS TEL CO	1,903	3,919,196	172
341067	IL	FRONTIER-ORION	1,621	3,337,886	172
442072	TX	CONSOLIDATED FT BEND	42,252	86,948,104	171
310721	MI	PIGEON TEL CO	3,573	7,351,551	171
441163	TX	WINDSTREAM SW-TX#1	285,469	587,222,865	171
361440	MN	CANNON VLY TELECOM	1,978	4,066,875	171
320818	IN	SMITHVILLE TEL CO	29,931	61,465,072	171
361433	MN	MID STATE TEL CO	6,738	13,831,524	171
300649	OH	ORWELL TEL CO	6,834	13,999,787	171
351250	IA	MUTUAL TEL CO	617	1,263,336	171
361380	MN	DELAVAN TEL CO	300	613,740	170
110036	MA	GRANBY TEL & TEL -MA	2,773	5,646,355	170
351133	IA	C-M-L TEL COOP ASSN	774	1,575,210	170
170161	PA	COMMONWEALTH TEL CO	298,947	607,973,682	169
270424	LA	CENTURYTEL-SE LA	10,801	21,964,750	169
170165	PA	DENVER & EPHRATA	55,098	111,925,363	169
341024	IL	HAMILTON COUNTY TEL	2,227	4,523,547	169
351275	IA	PRAIRIEBURG TEL CO	206	418,392	169
150122	NY	FRONTIER-SENECA GORH	8,578	17,419,963	169
315090	MI	MICHIGAN BELL TEL CO	3,828,724	7,774,043,692	169
371517	NE	ARLINGTON TEL CO	1,048	2,127,771	169
260402	KY	WINDSTREAM KY WEST	24,352	49,418,688	169
542308	CA	CITIZENS-FRONTIER CA	124,581	252,712,788	169
351304	IA	SWISHER TEL CO	951	1,928,248	169
170171	PA	HICKORY TEL CO	1,349	2,734,060	169
341047	IL	MCDONOUGH TEL COOP	3,977	8,058,716	169
170178	PA	FRONTIER-LAKEWOOD	1,462	2,962,481	169
401712	AR	MOUNTAIN VIEW TEL CO	7,380	14,911,220	168
442154	TX	GTE-SW VERIZON-TX	105,858	213,813,024	168
320744	IN	CAMDEN TEL CO - IN	1,667	3,363,832	168
340990	IL	CLARKSVILLE MUTUAL	283	570,220	168
351203	IA	HUBBARD COOP ASSN	804	1,619,844	168
522419	WA	HOOD CANAL TEL CO	1,453	2,925,114	168
351108	IA	BARNES CITY COOP	161	324,062	168
150092	NY	EDWARDS TEL CO	2,491	5,001,646	167
330896	WI	LAKEFIELD TEL CO	1,652	3,316,395	167
361410	MN	JOHNSON TEL CO	2,038	4,090,670	167
150114	NY	ORISKANY FALLS TEL	659	1,322,684	167
310704	MI	ACE TEL OF MICHIGAN	5,339	10,698,144	167
442060	TX	COMANCHE COUNTY TEL	5,000	10,017,328	167
170206	PA	SUGAR VALLEY TEL CO	1,091	2,185,522	167
341048	IL	MCNABB TEL CO	466	933,277	167
323034	IN	VERIZON N-IN(ALL TEL)	9,980	19,979,488	167
320839	IN	YEOMAN TEL CO, INC	958	1,913,026	166
150111	NY	ONEIDA COUNTY RURAL	3,441	6,868,719	166
310683	MI	CARR TEL CO	1,692	3,377,318	166
351245	IA	MINBURN TEL CO	413	823,755	166
351188	IA	GOLDFIELD TEL CO	556	1,108,761	166
330968	WI	WAUNAKEE TEL CO	7,571	15,077,417	166

Incumbent LEC Study Area Average AMOU per Month

Study Area Code	State	Study Area Name	2006 USF Loops*	2006 Industry MOUSs*	2006 AMOUS/Loop/Mo
300597	OH	THE CHILLICOTHE TEL	33,656	66,960,236	166
462181	CO	BIJOU TEL COOP ASSOC	1,446	2,875,062	166
340976	IL	ADAMS TEL COOP	4,134	8,211,982	166
330945	WI	SCANDINAVIA TEL CO	2,647	5,252,707	165
330859	WI	CENTRAL STATE TEL CO	10,015	19,863,438	165
320813	IN	PULASKI-WHITE RURAL	1,674	3,318,287	165
310738	MI	WOLVERINE TEL CO	8,808	17,455,221	165
361374	MN	ARROWHEAD COMM CORP	682	1,351,208	165
170151	PA	BUFFALO VALLEY TEL	20,596	40,773,512	165
633200	PR	PRTC - CENTRAL	147,985	292,907,967	165
361399	MN	GRANADA TEL CO	224	443,312	165
330964	WI	FRONTIER-WISCONSIN	25,174	49,791,929	165
150116	NY	PATTERSONVILLE TEL	1,271	2,513,571	165
330952	WI	SE TEL OF WISCONSIN	9,786	19,347,621	165
330899	WI	LA VALLE TEL COOP	2,009	3,970,574	165
220377	GA	PINELAND TEL COOP	12,953	25,554,890	164
361454	MN	PINE ISLAND TEL CO	3,201	6,314,286	164
330916	WI	MOUNT HOREB TEL CO	4,528	8,927,740	164
442065	TX	CUMBY TEL COOP INC	823	1,620,686	164
280467	MS	SMITHVILLE TEL CO	981	1,930,985	164
452191	AZ	ACCIPIPER COMM.	201	395,584	164
542343	CA	VOLCANO TEL CO	11,378	22,350,544	164
432006	OK	MCCLOUD TEL CO	8,545	16,772,146	164
330843	WI	AMHERST TEL CO	5,078	9,966,696	164
220348	GA	BULLOCH COUNTY RURAL	10,663	20,923,703	164
330900	WI	LEMONWEIR VALLEY TEL	3,301	6,475,327	163
310705	MI	CENTURY-NORTH MICH.	2,910	5,694,854	163
421876	MO	FARBER TEL CO	193	377,192	163
442083	TX	GUADALUPE VALLEY TEL	41,961	81,822,086	162
532359	OR	BEAVER CREEK COOP	4,354	8,487,725	162
150105	NY	MIDDLEBURGH TEL CO	7,087	13,814,114	162
280451	MS	DECATUR TEL CO -MS	1,906	3,712,253	162
150118	NY	PORT BYRON TEL CO	3,235	6,299,436	162
310689	MI	CENTURYTEL-UPPER MI	11,048	21,508,958	162
351153	IA	DUNKERTON TEL COOP	761	1,478,398	162
431982	OK	CIMARRON TEL CO	7,658	14,873,424	162
351157	IA	ELLSWORTH COOP ASSN	710	1,378,363	162
542338	CA	SIERRA TELEPHONE CO	23,246	45,127,027	162
542319	CA	VERIZON-CA (GTE)	3,656,921	7,092,555,725	162
220354	GA	CHICKAMAUGA TEL CORP	6,298	12,211,347	162
351130	IA	CLARENCE TEL CO	754	1,459,777	161
320771	IN	GEETINGSVILLE TEL CO	533	1,031,185	161
300633	OH	MIDDLE POINT HOME	670	1,294,350	161
522431	WA	MASHELL TELECOM INC	3,849	7,427,771	161
545170	CA	PACIFIC BELL	15,218,539	29,218,770,871	160
150110	NY	OGDEN TEL DBA FRNTER	18,170	34,862,684	160
361426	MN	MANCHESTER-HARTLAND	604	1,157,714	160
351261	IA	NORTHWEST TEL COOP	1,328	2,542,627	160
330870	WI	RHINELANDER-FRONTIER	3,347	6,402,390	159
320809	IN	COMM CORP OF S. IN	1,773	3,389,644	159
351264	IA	OLIN TEL CO, INC	710	1,356,858	159
351303	IA	COOP TEL EXCHANGE	623	1,187,269	159
503032	UT	BEAR LAKE COMM	887	1,689,160	159
330925	WI	BAYLAND TEL CO	2,368	4,508,681	159
351335	IA	WESTSIDE INDEPENDENT	378	719,001	159
320753	IN	CLAY DBA ENDEAVOR	12,007	22,797,585	158
150076	NY	CASSADAGA TEL CORP	1,369	2,596,804	158
320837	IN	WEST POINT TEL CO	776	1,468,964	158

Incumbent LEC Study Area Average AMOU per Month

Study Area Code	State	Study Area Name	2006 USF Loops*	2006 Industry MOUSs*	2006 AMOUS/Loop/Mo
330847	WI	BELMONT TEL CO	876	1,658,056	158
330931	WI	CENTURYTEL-SO WI	6,632	12,540,629	158
320807	IN	PERRY-SPENCER RURAL	5,888	11,131,834	158
442040	TX	BRAZORIA TEL CO	5,733	10,832,141	157
421917	MO	MID-MISSOURI TEL CO	4,136	7,814,293	157
610989	AK	ADAK TEL UTILITY	190	358,884	157
442068	TX	EASTEX TEL COOP INC	30,943	58,336,500	157
361383	MN	EAGLE VALLEY TEL CO	661	1,246,159	157
361515	MN	ZUMBROTA TEL CO	2,204	4,150,254	157
341009	IL	C-R TEL CO	814	1,532,587	157
170162	PA	THE CONESTOGA TEL	53,619	100,927,685	157
361384	MN	EASTON TEL CO	269	505,981	157
351162	IA	FARMERS COOP TEL CO	1,326	2,492,432	157
351263	IA	OGDEN TEL CO - IA	1,807	3,396,174	157
320756	IN	CRAIGVILLE TEL CO	1,098	2,062,210	157
300598	OH	MCCLURE TEL CO	712	1,336,984	156
442090	TX	ALENCO COMMUNICATION	2,098	3,931,500	156
330850	WI	BLOOMER TEL CO	3,273	6,131,582	156
371581	NE	PIERCE TEL CO	1,803	3,372,518	156
320750	IN	FRONTIER OF INDIANA (Av Sched)	2,205	4,121,465	156
442046	TX	CAP ROCK TEL COOP	4,871	9,091,187	156
220380	GA	PROGRESSIVE RURAL	5,597	10,444,716	156
351171	IA	FARMERS MUTUAL JESUP	1,968	3,669,377	155
300594	OH	THE CHAMPAIGN TEL CO	10,344	19,257,061	155
361502	MN	WESTERN TEL CO	2,424	4,506,256	155
361413	MN	MID STATE DBA KMP	1,964	3,642,577	155
351241	IA	MECHANICSVILLE TEL	757	1,398,594	154
300609	OH	DOYLESTOWN TEL CO	3,571	6,593,558	154
341029	IL	HENRY COUNTY TEL CO	1,475	2,723,131	154
320759	IN	DAVIESS-MARTIN/RTC	3,260	6,016,942	154
150107	NY	NEWPORT TEL CO	3,521	6,497,502	154
351277	IA	RADCLIFFE TEL CO	488	899,325	154
361422	MN	LONSDALE TEL CO	1,912	3,523,128	154
250307	AL	MOUNDVILLE TEL CO	1,659	3,053,626	153
361474	MN	ROTHSAY TEL CO, INC	570	1,048,869	153
361387	MN	EMILY COOP TEL CO	1,419	2,610,567	153
361419	MN	LISMORE COOP TEL CO	327	600,473	153
351331	IA	WEST IOWA TEL CO	4,901	8,968,955	153
361423	MN	LOWRY TEL CO, LLC	906	1,655,290	152
351137	IA	COON VALLEY COOP TEL	602	1,099,648	152
320827	IN	SWEETSER RURAL TEL	1,748	3,185,532	152
351322	IA	VENTURA TEL CO, INC	459	835,558	152
230495	NC	RANDOLPH TEL CO	4,495	8,176,629	152
391684	SD	UNION TEL CO.	1,777	3,231,120	152
351115	IA	BUTLER-BREMER MUTUAL	2,563	4,655,384	151
330905	WI	MANAWA TEL CO	2,510	4,557,207	151
351265	IA	ONSLOW COOP TEL ASSN	225	408,111	151
320829	IN	TIPTON TEL CO	4,522	8,193,524	151
300612	OH	FARMERS MUTUAL TEL	465	840,457	151
421901	MO	KINGDOM TELEPHONE CO	6,333	11,438,487	151
300663	OH	VAUGHNSVILLE TEL CO	295	532,456	150
341073	IL	FRONTIER-PRAIRIE	1,055	1,903,138	150
220362	GA	FRONTIER-FAIRMOUNT	2,503	4,510,146	150
351212	IA	JEFFERSON TEL CO -IA	3,391	6,107,937	150
300607	OH	CONTINENTAL OF OHIO	2,382	4,289,132	150
330898	WI	CENTURYTEL LARSEN	2,542	4,570,542	150
300644	OH	THE NOVA TEL CO	1,361	2,447,038	150
361409	MN	HUTCHINSON TEL CO	11,771	21,160,865	150

Incumbent LEC Study Area Average AMOU per Month

Study Area Code	State	Study Area Name	2006 USF Loops*	2006 Industry MOUSs*	2006 AMOUS/Loop/Mo
351199	IA	HAWKEYE TEL CO	463	832,241	150
320826	IN	SWAYZEE TEL CO	1,059	1,898,469	149
330849	WI	BLACK EARTH TEL CO	1,439	2,576,877	149
351248	IA	MONTEZUMA MUTUAL TEL	2,075	3,714,066	149
351220	IA	LA PORTE CITY TEL CO	1,816	3,244,177	149
351329	IA	WELLMAN COOP TEL	1,317	2,351,865	149
300625	OH	KALIDA TEL CO	1,527	2,722,300	149
472233	ID	RURAL TEL CO - ID	788	1,404,796	149
341011	IL	FRONTIER OF LAKESIDE	835	1,488,382	149
220387	GA	FRONTIER GEORGIA LLC (Av Sched)	21,932	39,075,806	148
330877	WI	CENTURYTEL-FAIRWATER	1,200	2,135,099	148
351295	IA	SHELL ROCK TEL CO	987	1,755,059	148
673900	AS	AMERICAN SAMOA	10,746	19,089,515	148
462202	CO	ROGGEN TEL COOP CO	281	498,870	148
351266	IA	ORAN MUTUAL TEL CO	254	450,767	148
351118	IA	CASCADE COMM. CO.	1,840	3,256,691	147
361350	MN	ARVIG TEL CO	12,723	22,498,993	147
290583	TN	WEST TENNESSEE TEL	4,151	7,314,806	147
320830	IN	TRI-COUNTY TEL CO	3,305	5,797,773	146
442153	TX	TEXAS WINDSTREAM	29,911	52,450,211	146
411756	KS	COLUMBUS TELEPHONE	2,159	3,780,225	146
411756	KS	COLUMBUS TELEPHONE	2,159	3,780,225	146
361476	MN	SACRED HEART TEL CO	490	855,942	146
290561	TN	CROCKETT TEL CO	4,037	7,040,875	145
351228	IA	LONE ROCK CO-OP TEL	262	456,776	145
351136	IA	COON CREEK TEL CO	641	1,114,870	145
300585	OH	ARCADIA TEL CO	734	1,276,276	145
150081	NY	CITIZENS HAMMOND NY	1,894	3,279,926	144
341045	IL	LEAF RIVER TEL CO	508	879,706	144
442041	TX	BRAZOS TEL COOP INC	5,752	9,925,576	144
330884	WI	CENTURYTEL-FORESTVIL	2,059	3,551,666	144
310726	MI	SHIAWASSEE TEL CO	5,463	9,410,097	144
361494	MN	UPSALA COOP TEL ASSN	1,150	1,977,447	143
442105	TX	LIPAN TEL CO	1,528	2,626,050	143
532383	OR	MOLALLA TEL CO.	6,433	11,054,870	143
613002	AK	BETTLES TEL CO INC	216	369,992	143
300659	OH	TELEPHONE SERVICE	9,670	16,522,850	142
270441	LA	STAR TEL CO	4,220	7,209,254	142
150135	NY	WARWICK VALLEY-NY	14,520	24,619,500	141
270428	LA	DELCAMBRE TEL CO	1,262	2,139,345	141
351247	IA	MODERN COOP TEL CO	932	1,573,521	141
442112	TX	MID-PLAINS RURAL TEL	3,058	5,152,444	140
442103	TX	LA WARD TEL EXCHANGE	1,096	1,844,706	140
421928	MO	NEW LONDON TEL CO	917	1,540,669	140
361412	MN	KASSON & MANTORVILLE	4,937	8,293,875	140
300662	OH	VANLUE TEL CO	742	1,243,949	140
341021	IL	GRANDVIEW MUTUAL TEL	102	170,885	140
341054	IL	MID CENTURY TEL COOP	4,385	7,337,798	139
361508	MN	WINTHROP TEL CO	1,127	1,882,507	139
351225	IA	LEHIGH VALLEY COOP	1,879	3,136,421	139
421865	MO	CITIZENS TEL CO - MO	3,922	6,539,692	139
351152	IA	DUMONT TEL CO	1,493	2,489,309	139
351238	IA	MARTELLE COOP ASSN	308	513,071	139
341061	IL	FRONTIER-MT. PULASKI	1,704	2,837,299	139
230496	NC	RANDOLPH MEMBERSHIP	9,969	16,567,999	138
300639	OH	THE NEW KNOXVILLE	1,330	2,207,994	138
361487	MN	STARBUCK TEL CO	1,794	2,977,202	138
351282	IA	ROCKWELL COOP ASSN	1,264	2,096,680	138

Incumbent LEC Study Area Average AMOU per Month

Study Area Code	State	Study Area Name	2006 USF Loops*	2006 Industry MOUSs*	2006 AMOUS/Loop/Mo
320792	IN	MULBERRY COOP TEL CO	2,906	4,818,330	138
351328	IA	WEBSTER-CALHOUN COOP	4,749	7,873,116	138
351173	IA	FARMERS MUTUAL COOP	2,515	4,156,371	138
330943	WI	RIVERSIDE TELECOM	3,613	5,968,989	138
341038	IL	FRONTIER OF ILLINOIS	4,643	7,669,451	138
310677	MI	ISLAND TEL CO	1,260	2,080,667	138
401698	AR	CLEVELAND COUNTY TEL	3,345	5,511,430	137
361475	MN	RUNESTONE TEL ASSN	4,612	7,593,518	137
361442	MN	NEW ULM TELECOM, INC	12,027	19,767,066	137
351302	IA	SPRINGVILLE COOP TEL	1,200	1,967,959	137
613026	AK	NORTH COUNTRY TEL CO	180	294,794	136
320778	IN	HOME TEL CO INC	2,101	3,431,576	136
411778	KS	GORHAM TEL CO	572	933,638	136
442150	TX	TATUM TEL CO	1,073	1,749,714	136
351097	IA	ANDREW TEL CO INC	367	597,170	136
320828	IN	FRONTIER-THORNTOWN	2,757	4,485,404	136
442143	TX	SOUTH PLAINS TEL	4,842	7,873,775	136
150112	NY	ONTARIO TEL CO, INC.	4,580	7,446,881	135
351139	IA	COOPERATIVE TEL CO	1,530	2,478,560	135
330954	WI	STOCKBRIDGE & SHERWD	3,438	5,568,009	135
442043	TX	NORTH TEXAS TEL. CO.	812	1,313,568	135
361414	MN	LAKEDALE TEL CO	12,579	20,253,007	134
120042	NH	DIXVILLE TEL CO	480	772,345	134
330857	WI	CENTURYTEL-MW-WI(CASCO)	1,260	2,017,823	133
351217	IA	KEYSTONE FRMS COOP	970	1,548,658	133
300604	OH	COLUMBUS GROVE TEL	1,756	2,798,436	133
442052	TX	CENTRAL TEXAS CO-OP	7,409	11,780,596	133
351105	IA	AYRSHIRE FARMERS MUT	322	511,662	132
361356	MN	BENTON COOP TEL CO	4,929	7,803,458	132
351336	IA	WILTON TEL CO	1,862	2,942,999	132
351113	IA	BROOKLYN MUTUAL TEL	1,517	2,396,920	132
330914	WI	EASTCOAST TELECOM	6,156	9,683,405	131
361430	MN	MELROSE TEL CO	10,626	16,707,539	131
361482	MN	SHERBURNE CTY RURAL	17,390	27,334,443	131
170179	PA	LAUREL HIGHLAND TEL	5,858	9,181,017	131
442057	TX	COLEMAN COUNTY CO-OP	2,296	3,593,736	130
300658	OH	SYCAMORE TEL CO	1,998	3,126,067	130
361499	MN	CROSSLAKE TEL CO	2,499	3,896,990	130
361437	MN	MINNESOTA LAKE TEL	516	801,366	129
361372	MN	CLEMENTS TEL CO	203	314,095	129
330851	WI	BONDUEL TEL CO	1,995	3,083,945	129
442076	TX	GANADO TELEPHONE CO	2,873	4,440,028	129
240532	SC	LOCKHART TEL CO INC	621	954,490	128
442151	TX	TAYLOR TEL CO-OP INC	7,214	11,081,958	128
300656	OH	SHERWOOD MUTUAL TEL	1,380	2,116,859	128
361347	MN	ALBANY MUTUAL ASSN	3,597	5,506,516	128
442116	TX	MUENSTER DBA NORTEX	4,327	6,586,310	127
411840	KS	TWIN VALLEY TEL INC	6,949	10,526,761	126
367123	MN	CITIZENS-FRONTIER-MN	3,507	5,306,088	126
361373	MN	CONSOLIDATED TEL CO	9,940	15,036,935	126
351121	IA	CENTER JUNCTION TEL	137	206,945	126
150135	NY	WARWICK VALLEY-NY	14,520	21,848,219	125
442117	TX	CENTURYTEL-PORT ARAN	4,513	6,788,999	125
170145	PA	BENTLEYVILLE TEL CO	2,925	4,374,282	125
361510	MN	WOODSTOCK TEL CO	1,327	1,984,220	125
522417	WA	HAT ISLAND TEL CO	100	149,359	124
361370	MN	CLARA CITY TEL EXCH	1,682	2,490,812	123
442131	TX	POKA-LAMBRO TEL COOP	3,061	4,519,553	123

Incumbent LEC Study Area Average AMOU per Month

Study Area Code	State	Study Area Name	2006 USF Loops*	2006 Industry MOUSs*	2006 AMOUS/Loop/Mo
351257	IA	NORTH ENGLISH COOP	875	1,290,817	123
150091	NY	DUNKIRK & FREDONIA	9,329	13,687,893	122
381601	ND	ABSARAKA COOP TEL CO	49	71,700	122
442168	TX	WES-TEX TEL CO-OP	2,789	4,057,553	121
320816	IN	S & W TEL CO	428	619,029	121
351101	IA	ATKINS TEL CO, INC	903	1,305,058	120
361396	MN	GARDONVILLE COOP TEL	3,365	4,863,005	120
341058	IL	MONTROSE MUTUAL TEL	1,583	2,280,049	120
361472	MN	REDWOOD COUNTY TEL	7,532	10,808,916	120
220368	GA	HART TEL CO	9,340	13,372,092	119
491231	NM	MESCALERO APACHE	1,197	1,710,614	119
300664	OH	WABASH MUTUAL TEL CO	927	1,308,840	118
442069	TX	ELECTRA TELEPHONE CO	1,619	2,281,239	117
170183	PA	MAHANAY & MAHANTANGO	3,967	5,582,125	117
310669	MI	ALLENDALE TEL CO	4,873	6,778,296	116
442135	TX	SOUTHWEST TEXAS TEL	4,608	6,405,579	116
442061	TX	COMMUNITY TEL CO	1,802	2,501,829	116
442159	TX	VALLEY TEL CO-OP -TX	6,101	8,459,904	116
440425	TX	CAMERON TEL CO TEXAS	1,089	1,508,210	115
300614	OH	FORT JENNINGS TEL CO	845	1,167,620	115
361439	MN	MINNESOTA VALLEY TEL	933	1,277,586	114
351342	IA	WOOLSTOCK MUTUAL	221	302,041	114
623021	HI	SANDWICH ISLES COMM.	1,541	2,096,125	113
442070	TX	ETEX TEL COOP INC	14,312	19,467,167	113
300650	OH	OTTOVILLE MUTUAL	1,508	2,050,220	113
310542	MI	ALLBAND COMM COOP	22	29,891	113
442093	TX	INDUSTRY TEL CO	2,369	3,211,119	113
442059	TX	COLORADO VALLEY TEL	7,020	9,048,713	107
160135	NJ	WARWICK VALLEY-NJ	8,176	10,478,357	107
310692	MI	DRENTH TEL CO	731	924,311	105
542332	CA	THE PONDEROSA TEL CO	9,657	12,198,431	105
270432	LA	KAPLAN TEL CO	4,943	6,233,259	105
351172	IA	FARMERS MUTUAL TEL	2,253	2,804,106	104
160135	NJ	WARWICK VALLEY-NJ	8,176	9,903,732	101
341093	IL	YATES CITY TEL CO	470	550,538	98
442134	TX	RIVIERA TEL CO INC	1,263	1,473,273	97
351156	IA	EAST BUCHANAN COOP	1,563	1,808,710	96
421934	MO	ORCHARD FARM TEL CO	783	896,351	95
300619	OH	GLANDORF TEL CO	1,162	1,309,305	94
613005	AK	CIRCLE UTILITIES	44	49,572	94
351187	IA	PARTNER COMM. COOP.	3,637	4,096,046	94
341046	IL	LEONORE MUTUAL TEL	164	184,123	94
452173	AZ	TOHONO O'ODHAM UTIL.	3,983	4,404,156	92
341017	IL	GLASFORD TEL CO	1,216	1,320,298	90
351276	IA	PRESTON TEL CO	1,296	1,350,329	87
320796	IN	NEW LISBON TEL CO	1,031	1,044,073	84
361348	MN	WILDERNESS VALLEY	77	75,642	82
542324	CA	KERMAN TELEPHONE CO	6,690	5,432,271	68
442073	TX	BORDER TO BORDER	144	82,903	48
521402	WA	M&L ENT. dba SKYLINE	148	59,975	34
520581	WA	BEAVER CREEK TIMBRLN	27	10,720	33
493403	NM	SACRED WIND	2,491	99,638	3
Combined all Study Areas			146,873,781	379,244,174,729	215

Loop Data Per "Universal Service Fund Data NECA Study Results, See http://www.fcc.gov/Bureaus/Common_Carrier/Reports/FCC-State_Link/Monitor/

2006 AMOU Data Per Network Usage by Carrier. See http://www.fcc.gov/Bureaus/Common_Carrier/Reports/FCC-State_Link/Monitor/netwu06.zip

ATTACHMENT

**(Declaration Of Adam Panagia
On Behalf Of AT&T Inc.)**

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

In the Matter of	)	
	)	
Establishing Just and Reasonable Rates for	)	WC Docket No. 07-135
Local Exchange Carriers	)	

**DECLARATION OF ADAM PANAGIA
ON BEHALF OF AT&T INC.**

December 17, 2007

1. My name is Adam Panagia. I am employed by AT&T Inc. ("AT&T") as Associate Director, Global Fraud Management Organization, Network Fraud Investigations. I am responsible for safeguarding the assets of AT&T through prevention, detection and deterrence of fraudulent activity perpetrated against AT&T and its customers. I have more than 20 years experience in the telecommunications industry in the areas of billing operations/development, revenue assurance and fraud management. I am frequently invited to speak and present at various industry and law enforcement forums and educational seminars, and I currently sit on the Communications Fraud Control Association (<http://www.cfca.org>) Board of Directors and have held that position since 2003.

2. One of my principal responsibilities is detecting and collecting evidence of schemes implemented by incumbent local exchange carriers ("ILECs") and competitive local exchange carriers ("CLECs") to inflate access billings by stimulating traffic to areas with high access charges. The purpose of this declaration is to respond to the questions raised in paragraph 13 of the Federal Communications Commission's Notice of Proposed Rulemaking, *Establishing Just and Reasonable Rates for Local Exchange Carriers*, WC Docket No. 07-135, FCC 07-176 (rel. Oct. 2, 2007), which asks for information regarding the scope and types of ILEC and CLEC traffic pumping schemes.

3. As I demonstrate below, the numerous traffic pumping schemes my team has detected vary considerably, but they generally share the same core characteristics: an ILEC or CLEC establishes high terminating access charges; it enters into an arrangement with one or more calling services that agree to provide callers with a nominally "free" (or very inexpensive) service; the calling service advertises its service with telephone numbers supplied by the LEC on websites and other media; millions of calls to the calling service are routed through or to the

LEC's exchange; and the LEC then bills terminating access charges to AT&T and other interexchange carriers ("IXCs") for these calls and shares the proceeds with its calling service partners.

4. The ILECs and CLECs that engage in these schemes typically are located in very rural areas and serve only a few hundred access lines. The historical monthly number of access minutes originated or terminated by these LECs, therefore, tends to be very low. With such low traffic volumes, these LECs have been permitted to tariff very high access charges ostensibly to spread high fixed costs of service over relatively low traffic volumes. Upon implementing traffic pumping schemes, however, the monthly access minutes served by these LECs typically increases by several orders of magnitude. When the LECs apply their existing high access charges (set on the premise of very low traffic volumes) to these minutes, the result is access bills to AT&T and other IXCs that increase from a few hundred or thousand dollars to tens of thousands or even millions of dollars monthly.

5. The traffic pumping schemes are typically implemented through a partnership or similar arrangement between the LEC and a service provider (usually a web-based company). The service provider's role in these schemes is to generate the substantial increase in the number of minutes of calls to access lines owned by the LEC. The service provider typically sets up a nominally "free" or low cost service – as discussed below, these services include, among others, adult chat lines, conference calling, voice mail, international calling and many other variants – and then it advertises those services on the Internet and other media. These advertisements invite callers from all over the world to dial a telephone number associated with the traffic pumping LEC in order to obtain the service. Although the call will be a long-distance call for most people, the advertisements typically point out that individuals who have wireline, VoIP or

wireless service with “unlimited” long-distance calling (or a very high number of long-distance minutes that can be used at no additional fee, *e.g.*, most wireless plans offer several hundred minutes of “all-distance” calls at no additional fee) can make these calls for free. When a long-distance call is placed to the advertised number the LEC delivers the call to the service provider, which then provides the advertised service. The LEC then bills access charges to the IXC that delivered the long-distance call to the LEC, and the LEC shares part of those revenues with the traffic pumping service provider.

6. In an October 4, 2007 article, *The Wall Street Journal* recently described one example of a LEC and its partner’s traffic pumping scheme:

Two-and-a-half years ago Ron Laudner was the anxious owner of a rural phone company serving this tiny town, where Main Street was emptying out as restaurants and other businesses disconnected their phones and moved to busier commercial districts.

More than 1,800 miles away, David Erickson was running a Web-based conference-calling business in Long Beach, Calif., shopping around for phone companies to be his partners.

In mid-summer 2005 this unlikely duo struck a deal. They routed millions of minutes of Mr. Erickson's conference calls through the switches of Mr. Laudner's Farmers Telephone of Riceville. To do it, they used outdated federal regulations to charge telecom companies such as AT&T Inc. and Verizon Communications Inc. steep rates and collected huge profits at their expense. Together, the two made hundreds of thousands of dollars. Soon, Mr. Laudner cut other deals to generate even more traffic. At the peak, his little telephone company was facilitating conversations among everybody from Mary Kay Cosmetics employees to customers of Male Box, an “all male all gay” chat line.

7. Although the parties engaged in these schemes generally have attempted to conceal the nature of their contractual and other arrangements, during my investigations of traffic pumping activities, I have obtained both agreements between traffic pumping LECs and their service provider partners and e-mail communications that describe the nature and terms of those arrangements. For example, one such agreement provides for payments from the LEC to the

calling service partner of \$0.007 for the first two million minutes generated by the scheme and directed to the LEC's exchange, and \$0.013 for every minute above 2 million generated by the scheme. Another such agreement provides \$0.005 for the first million minutes, then \$0.007 up to 4 million minutes, and \$0.01 minute for every minute above 4 million.

8. In addition to the agreements between the traffic pumping LECs and their partners, I also have obtained and reviewed letters from LECs to their traffic pumping service providers discussing these agreements. For example, one such letter was sent by a LEC to its traffic pumping service provider after IXC's had identified the traffic pumping activities and began withholding payment of the corresponding access charges. In that letter, after explaining that IXC's had detected their traffic pumping activities and that the IXC's had begun to withhold payment of a substantial percentage the LEC's access bills, the LEC informs its traffic pumping partners that: "As per our contractual agreements we will be reluctantly withholding this percent amount from your payment."

9. Based on my investigations, it is clear that traffic pumping schemes are widespread and are generating increasingly higher volumes of traffic pumping minutes. In just the last month (November 2007), traffic pumping schemes generated more than *85 million* minutes on AT&T's network alone. Moreover, while ILECs were among the first traffic pumpers and continue to engage in significant amounts of traffic pumping, CLECs appear to have been lured by the potential to earn millions of dollars through such schemes, and CLECs thus now account for more than *three quarters* of the traffic pumping minutes billed to AT&T.

10. As noted, the traffic pumping schemes typically rely on services offered by the traffic pumping service provider. As discussed below, however, there are other types of traffic pumping schemes that appear to be growing in popularity among traffic pumpers. The

remainder of this declaration describes the main traffic pumping techniques my team has uncovered. There are other types of apparent traffic pumping schemes that we are still investigating, and there likely are many other schemes that we have not yet detected.

11. *Adult Entertainment/Party/Sex/Chat Line Services.* One of the most prevalent traffic pumping techniques is to provide “free” or low cost chat lines, often providing sexually explicit content. Under this scheme, the traffic pumping service provider connects chat line equipment to the LEC’s network, either by collocating the equipment at the LEC’s end office, or by connecting to the LEC using high capacity or VoIP lines (there may be other methods of connection, but these are the methods that we are aware of). The traffic pumping LEC allocates telephone numbers to the traffic pumping service provider, and the service provider advertises these numbers on the Internet and other media, typically pointing out that the calls are “free” to anyone with wireline long-distance plans with unlimited calling minutes (including VoIP plans) and wireless callers with large blocks of minutes each month.¹ When a caller dials one of the advertised telephone numbers, the traffic pumping LEC routes the call to the traffic pumping service provider, and the caller is then added to one of the chat “rooms.” These chat services are typically configured to allow up to 270 simultaneous callers (they provide 27 chat “rooms,” with each room supporting up to ten 10 participants). These traffic pumping schemes are extremely effective. In November 2007, AT&T’s long distance network alone transported more than 2.3 million calls associated with this scheme, totaling more than 47.4 million minutes to only 2,610 traffic pumping lines.

¹ There are numerous websites advertising these services, including: www.studio55.com, <http://partyline.com>, <http://talkee.com/>, <http://www.thefreechatline.com>, <http://www.subjecttalk.com/subjecttalk/home.jsp>, <http://www.uncensoredpartyline.com/allsystems.html>, <http://www.talk121.com>.

12. These “chat” services often contain very graphic sexual content and have no reliable methods to ensure that the service being provided is appropriate to the age of a caller. My team monitors these advertisements and calls the advertised phone numbers to determine the nature of the “service.” Upon dialing these chat services, typical introductions to the service include “you’ve reached the back door to the new man hole”; “welcome to the hot chocolate line”; “welcome to Club 747 the hottest way to meet singles”; and “hey baby thanks for calling.”

13. *Free Conference Bridge Services.* Free conference bridge services are a more recent traffic pumping technique, and in the past two years have become one of the predominant methods of traffic pumping. This traffic pumping service operates and is configured generally in the same manner as the chat line services discussed above. However, rather than offering “chat” services, this traffic pumping service offers individuals and businesses “free” conference calling services,² allowing hundreds of callers to participate simultaneously in conference calls on a single access line. In November 2007 alone, AT&T transported 719,187 traffic pumping conference bridge calls, totaling more than 22.6 million minutes to only 99 lines.³

² These services are advertised on myriad web sites, including, among others, www.freeconferencecall.com, www.freeconference.com, www.freeconferencecallnetwork.com, <http://freephoneconference.com>, www.goconference.com, www.freegoconference.com, www.confrecall.com, www.telejunctions.com, www.easyfreeconferencing.com, <http://www.instantconference.com>, www.highspeedconferencing.com, www.smartofficesolutions.com.

³ By contrast, AT&T’s conference bridges are associated with 4ESS and 5ESS switching systems within its own network; the specific locations that are selected for the switching systems and the associated bridges are determined solely by considerations of efficient network management, such as trunking capacity, and not by the terminating access rates applicable to calls to those locations. Moreover, AT&T charges its end user customers for such services, and to the extent AT&T charges an access rate, the access rates merely reflect the “target rate” for such charges established by the Commission’s *CALLS Order* (because all of AT&T’s conference bridges are situated in locations where the *CALLS Order* governs access rates). See *Access Charge Reform, et al.*, Sixth Report and Order, 15 FCC Rcd. 12962 (2000) (“*CALLS Order*”). Also, AT&T does not pay service providers to artificially stimulate traffic on AT&T’s network.

14. *Free International Long Distance Calls.* Free international calling services are another recent traffic pumping technique. Under this scheme, the LEC again allocates telephone numbers to the service provider, and the service provider connects to the LEC's network either at the LEC's end office or through a connection to the traffic pumping service provider's premises. The traffic pumping service provider then secures international wholesale arrangements that allow traffic to be terminated in foreign countries at a fraction of the access termination charges imposed by the traffic pumping LEC. The traffic pumping service provider then advertises on websites and other media free international calls for anyone who dials the advertised telephone numbers (the numbers associated with the traffic pumping LEC).⁴ When a caller located outside the traffic pumping LEC's service territory dials the advertised number, the LEC delivers the call to the traffic pumping service provider, where the caller is connected to equipment that allows the caller to dial the international number they wish to reach, and the call is then routed by the calling service's wholesale long-distance partner (which may be VoIP or other low-cost services) to the foreign country where the call is terminated to the called party. The LEC then treats that call as having "terminated" on its network (rather than in the foreign country), and bills the IXC that initially carried the call to the LEC terminating access charges for that call. Because those terminating access charges are much higher than what the service provider pays to complete the call to the foreign country, the arbitrage strategy is highly profitable.⁵ This is one of the traffic pumping schemes that IXCs detected earlier this year, resulting in lawsuits and significant reductions in its use. But, at its peak in January 2007, AT&T transported more than 4.3 million of these calls, totaling more than 18.5 million minutes to only 465 access lines.

⁴ Example of websites that advertised these calls are: <http://www.cheapcollegecalling.com>; <http://www.revos.com>; www.freecallplanet.com; and <http://www.futurephone.com>.

⁵ Although these schemes typically are designed for international calling, AT&T also has identified similar schemes for domestic long distance calls.

15. *“Free” Voicemail.* Under this scheme, a traffic pumping LEC assigns telephone numbers to a traffic pumping service provider, and the traffic pumping service provider uses those telephone numbers to provide “free” voicemail services that are advertised on websites and other media.⁶ Whenever a call to a subscriber of this voicemail service is diverted to voicemail, the traffic pumping LEC bills the IXC that delivered the call terminating access charges for delivering the call to the voicemail service provider. Likewise, whenever the “subscriber” of the voicemail service calls the number to retrieve messages, the LEC bills the IXC that carried that call terminating access charges for delivering the call to the voicemail service provider. The LEC and the voicemail service provider share these access charges. These voicemail schemes have become so rampant in Iowa – with millions of Iowa telephone numbers being used for this scheme – that the Iowa Utilities Board has expressed concern about potential telephone number exhaustion as a result of this scheme.

16. *Usage stimulation to VoIP Gateway.* Another traffic pumping scheme abuses Voice over Internet Protocol (VoIP) services that can receive calls from anywhere in the world by attaching a VoIP phone with a USB port into a home personal computer. Under this scheme, the service provider provides an end-user with the VoIP equipment and a VoIP telephone number. Callers located anywhere in the world can then call that end-user by first dialing a telephone number owned by the traffic pumping LEC. When that number is dialed the call is then routed to the service provider, which allows the caller to dial the end-user’s VoIP phone number, and the call is then connected. The traffic pumping LEC then bills the IXC that initially

⁶ Just a few Examples of these traffic pumping voicemail services include: www.webpointcommunications.com, www.freedigits.com, www.matchdigits.com, www.officedigits.com, www.faxdigits.com, www.talkdigits.com, www.hopedigits.com, and www.privatephone.com.

carried the call to the LEC a terminating access charge for that call, notwithstanding that the recipient of the call may be located anywhere in the world.

17. *Missed Call Scheme Remote Call Forwarding.* The basics of this scheme are straightforward: the service provider uses auto-dialing equipment (or similar techniques) to make thousand of calls to wireline and wireless phone numbers throughout the U.S. (at least some of which are on the Federal Trade Commission's Do Not Call Registry); the service provider then leaves a voicemail message advertising some sort of service, asking for a return call to a telephone number associated with the traffic pumping LEC; a significant number of the call recipients call the number left on their voicemail or simply dial the number left on their caller ID; the call is then forwarded to a toll-free number of a third party that is typically unaware of the scheme; the traffic pumping LEC then bills the IXC that carried the return call to the LEC terminating access charges, and the LEC also bills the IXC that carries the portion of the call that is forwarded to the third party for originating access charges.

18. Ironically, the "services" advertised in the voicemails associated with these schemes often advertise access to a "do not call" registry, notwithstanding that at least some of the telephone numbers dialed by the traffic pumping service are themselves on the federal Do Not Call Registry. In any event, when the caller returns the call, the service provider merely forwards the call to the Federal Trade Commission's Do Not Call Registry telephone number or to a private Do Not Call Registry telephone number. Nonetheless, the LEC still bills the IXC that delivered the call to the LEC terminating access charges and the LEC also bills the IXC that carried the portion of the call that is forwarded to the do not call registry for originating access charges. Banking services are also often advertised in these voice mails. But when a caller returns the call, the service provider merely forwards to the call to a bank or credit card company

that is completely unaware of the scheme. And, again, the LEC bills the IXC that delivered the call to the LEC terminating access charges and it also bills the IXC that delivered the portion of the call forwarded to the bank originating access charges.

19. *Programmed-Dialing to AT&T Toll Free Customer Base & FAX Blasting.* As noted, although most schemes my team has identified are designed to stimulate terminating access minutes, my team is increasingly uncovering schemes that also seek to stimulate originating access minutes. Under one such scheme, a telemarketer uses auto-dialing equipment to “spray” large volumes of calls to AT&T’s toll free subscriber numbers. The LEC serving the telemarketer then bills AT&T originating access charges for such calls for originating the calls from the telemarketer to the toll free number. While we are still investigating these schemes, we believe that in many instances, the telemarketers have access revenue sharing arrangements with the LEC that encourage the telemarketers to “spray” as many calls as possible to generate high volumes of originating access minutes.

20. In a similar traffic pumping scheme, we believe that fax service providers are purchasing flat rate long distance services from AT&T, and simultaneously entering into a traffic pumping revenue sharing agreement with a traffic pumping LEC. The fax service provider collocates equipment at the traffic pumping LEC’s end office (or otherwise connects to the LEC), and then launches high volumes of fax transmissions over AT&T’s long distance network. The traffic pumping LEC then bills AT&T originating access charges for those calls and shares those revenues with the fax provider.

VERIFICATION PAGE

I declare under penalty of perjury that, based on the information available to me,
the foregoing Declaration is true and correct.

Respectfully submitted,

/s/ Adam Panagia

December 17, 2007