

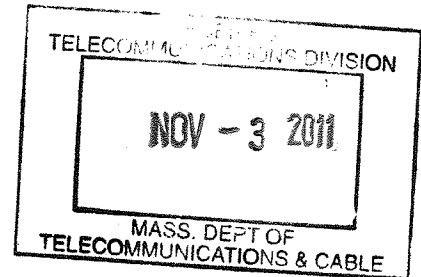


11-7  
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November 2, 2011



Department of Telecommunications and Cable  
1000 Washington Street, Suite 820  
Boston, MA 02118-6500

Re: DTC First Set of Information Requests Regarding Nexus Communications, Inc.  
Application for ETC Status

Dear Madam or Sir:

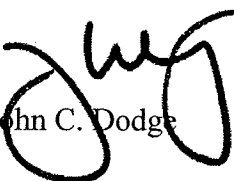
Enclosed for filing with the Commission please find an original plus two (2) copies of the Responses of Nexus Communications to the Department's First Set of Information Requests submitted in connection with the Application of Nexus Communications, Inc. for Designation as an Eligible Telecommunications Carrier for Low Income Support Only.

Kindly date stamp as received the stamp and return copy included herewith, and return it to the undersigned in the prepaid envelope.

Do not hesitate to contact the undersigned with any questions about this matter.

Sincerely,

Davis Wright Tremain LLP

  
John C. Dodge

Enclosure

**ORIGINAL**

Nexus Communications, Inc.

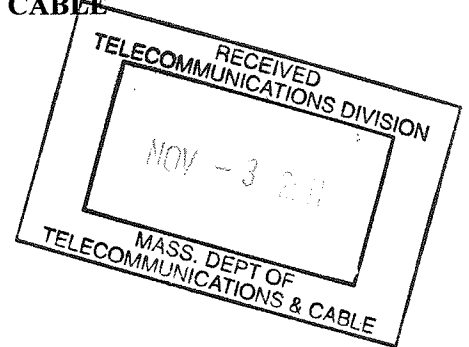
D.T.C. 11-7

Public Response to D.T.C.'s First Set of Information Requests

**BEFORE THE COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

In the Matter of Application of Nexus  
Communications, Inc. for Designation as an  
Eligible Telecommunications Carrier for Low  
Income Support Only

D.T.C. 11-7



**NEXUS' RESPONSES TO  
FIRST SET OF INFORMATION REQUESTS (NOS. 1-29)  
OF THE DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

**PUBLIC VERSION**

Nexus Communications, Inc. ("Nexus") hereby submits its responses to the First Set of Information Requests (Nos. 1-29) of the Department of Telecommunications and Cable ("D.T.C.") in the above-captioned proceeding. Certain information requested herein is proprietary confidential information and Nexus will submit a request for a protective order and confidential classification in consultation with D.T.C. Staff and provide the information once the appropriate protections are in place. Confidential information that will be provided has been indicated with yellow highlighting below. Finally, attached to Nexus' responses is the certification of the person providing said responses.

## INDEX OF EXHIBITS TO INTERROGATORIES

<b>Interrogatory</b>	<b>Exhibit</b>	<b>Description</b>
DTC 1-1	Exhibit 1	Excerpts from Nexus Communications, Inc. State Commission ETC Designation Orders
DTC 1-3	Exhibit 2	Ohio Order
DTC 1-5	Exhibit 3	Certification
DTC 1-8	Exhibit 4	List of Wire Centers Where Nexus Will Provide Service in Massachusetts
DTC 1-9	Exhibit 5	Massachusetts Coverage Area Map
DTC 1-11	CONFIDENTIAL Exhibit 6	Description of the Facilities Owned In Whole or In Part by Nexus, Their Location and the Identity of the Co-Owner (or Underlying Carrier)
DTC 1-17	CONFIDENTIAL Exhibit 7	911/E911 Call Delivery Document
DTC 1-24	Exhibit 8	Articles of Incorporation and Certificate of Good Standing
DTC 1-25	CONFIDENTIAL Exhibit 9	Financial Information

## **RESPONSES**

D.T.C. 1-1     Identify all states where Nexus has been designated as an ETC and whether that designation is limited and how it is limited, including any specific requirements imposed on or volunteered by Nexus. Also provide complete and detailed documentation describing such limitations and/or specific requirements. If Nexus' ETC designation has been terminated in any state, identify the state and provide complete and detailed documentation describing the reasons therefore.

**Response:**

As of the submission date of these responses, the following state Commissions have granted eligible telecommunications carrier ("ETC") designation as proposed by the Company:

Nexus offers only wireline Lifeline service in Alabama, Florida, Kentucky, North Carolina, Oklahoma, South Carolina, Tennessee, and Texas.

Nexus offers only wireless Lifeline service in California, Georgia, Iowa, Maine, Maryland, Missouri, Nevada, New Jersey, Ohio, Rhode Island, and West Virginia.

Nexus offers wireline and wireless Lifeline service in Arkansas, Illinois, Kansas, Louisiana, Michigan, Mississippi and Wisconsin.

The majority of the Company's requests for designation as an ETC have been granted without limitation. Attached as **Exhibit 1** are excerpts from those orders designating Nexus as an ETC that impose conditions, other than those applicable to all ETCs. As of the date of this submission, Nexus is in compliance with all state requirements for ETC designation, applicable to the offering of low-income support and has not had its ETC designation terminated in any state.

D.T.C. 1-2 Identify each state where Nexus has a petition currently pending for ETC designation and describe the status of each petition.

**Response:**

As of the date of this submission, Nexus has petitions for designation as an ETC pending with the Commissions of the states of Idaho, Indiana, Kentucky, Massachusetts, Minnesota, Oklahoma, Oregon, Pennsylvania, Vermont, and Washington.

In addition, Nexus filed a Petition with the Federal Communications Commission ("FCC") on April 5, 2011 seeking designation as an ETC in the states of Alabama, Connecticut, the District of Columbia, Delaware, North Carolina, New Hampshire, New York, Tennessee and Virginia and on June 3, 2011 seeking designation as an ETC in the state of Florida.

D.T.C. 1-3 Identify each state that has denied a petition for ETC status from Nexus, and provide a copy of the denial issued by the commission or government agency.

**Response:**

In 2006, the Public Utilities Commission of Ohio ("PUCO") denied Nexus' request for ETC designation with respect to its wireline service. The PUCO's denial was based on Nexus' then-current rates for wireline service. However, the PUCO noted in the denial that "[i]n the event that circumstances change...the Commission may reevaluate its position in this matter..." Since that time, Nexus has largely shifted its operations to wireless services and has since been designated an ETC in the state of Ohio and was granted ETC authority for wireless in June 2011.

No other state commission has denied Nexus for ETC designation for wireline or wireless service.

Attached as **Exhibit 2** is the Order issued by the PUCO.

D.T.C. 1-4 Identify any and all ongoing litigation that affect or may affect the services offered or intended to be offered by Nexus in the Commonwealth of Massachusetts, including but not limited to disputes over patents covering Nexus' services. Provide a copy of all judicial filings made in relation to such litigation.

**Response:**

Nexus is not involved in any litigation that would affect the services intended to be offered by Nexus in the Commonwealth of Massachusetts.

D.T.C. 1-5      Certify whether the FCC, any state commission, or government agency has, to date, rendered or entered a finding, conviction, or civil judgment against Nexus during the last three years. Provide a copy of any such finding, conviction, or civil judgment entered against Nexus.

**Response:**

Nexus has not been subject to an agency finding, conviction or civil judgment during the last three years, as evidenced by the certification found in **Exhibit 3**.



D.T.C. 1-6      State whether Nexus is certified by the FCC as a Mobile Virtual Network Operator.

**Response:**

Pursuant to the requirements 47 C.F.R. § 54.201(d)(1), Nexus uses a combination of its own facilities and the facilities and services of another carrier to offer the services that are supported by federal universal service support. By doing so, Nexus meets the federal definition of a facilities-based carrier. As Nexus does not offer the supported services purely through resale, unlike companies such as American Movil ("TracFone"), Nexus is not required to certify with the FCC as a Mobile Virtual Network Operator.

D.T.C. 1-7      State whether Nexus is currently offering any services in Massachusetts and the date(s) it began offering such services. Describe the scope of Nexus' existing business in Massachusetts, including geographic areas of operation, a description of services offered, and total number of Massachusetts customers. State whether Nexus is current with respect to filing annual returns with the Department.

**Response:**

Nexus does not currently offer any services in Massachusetts.

D.T.C. 1-8     Provide a list of the wire centers in Massachusetts that Nexus will be using to offer Lifeline service.

**Response:**

Nexus submitted a list of the wire centers in Massachusetts where Nexus will be offering Lifeline service as Attachment A to its Application. This same list is included with this response as **Exhibit 4**.

D.T.C. 1-9     Provide a coverage map of each network that Nexus will use to provide service in Massachusetts.

**Response:**

Nexus submitted a map of the coverage area that it will use to provide service in Massachusetts as Attachment A to its Application. The same map is included with these responses as **Exhibit 5**.

D.T.C. 1-10 Describe where in Massachusetts and by what methods Nexus currently advertises its services and provide sample copies of same. Also, identify with specificity the media of general distribution that Nexus intends to use for advertising the services and charges supported by Federal universal service support mechanisms pursuant to 47 USC § 254(c).

**Response:**

Consistent with the response to DTC 1-7, Nexus does not currently provide service in Massachusetts and as such, is not advertising service that is not currently available. However, in states where Nexus has been designated as an ETC, it is engaged in an Advertising and Outreach Plan, as required by 47 USC § 214(e)(1)(B) structured to promote maximum visibility of the supported services, including Lifeline and Link Up, throughout the Company's designated service areas. In these jurisdictions, Nexus uses advertising mediums that have a proven track record of effectively identifying, informing, and educating current and potential subscribers about these services, thereby increasing consumer awareness and the overall penetration of Lifeline and Link Up subscribership in the various states in which it operates. Upon designation as an ETC in Massachusetts, the Company will begin implementation of its Advertising and Outreach Plan throughout the designated service area, which will continue unabated for as long as the Company is designated as an ETC in the Commonwealth of Massachusetts.

To accomplish this goal, Nexus will post company-specific Lifeline and Link Up information on its Corporate website as well as on USAC's Low Income consumer website located at <http://www.lifelinesupport.org>.

Nexus will coordinate its outreach efforts with and provide advertising materials to community health, welfare and employment offices to ensure that information about Lifeline and Link Up reaches those most likely to qualify for these benefits. Outreach efforts will also include a program, recently recognized by the Federal-State Joint Board on Universal Service,<sup>1</sup> in which Nexus' Mobile information vehicles visit economically disadvantaged neighborhoods and provide information about the Low-Income programs.

Nexus will also begin print advertising using media of general distribution. Specifically, the Company will begin by advertising the availability of Lifeline and Link Up in the designated area through free publications as these are available without cost or subscription requirements and are widely distributed throughout the Commonwealth of Massachusetts. As such, Nexus believes that this form of advertisement to not only be effective but consistent with the requirements of §54.405 and 54.411, which require ETCs to publicize the availability of Lifeline and Link Up service in a manner reasonably designed to reach those likely to qualify for the support.

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<sup>1</sup> *In Re Federal-State Joint Board on Universal Service; Lifeline and Link Up*, Recommended Decision, 2010 FCC Lexis 6557, at ¶ 64 (Jt. Bd. Rel. Nov. 4, 2010).

In addition, Nexus will implement a brisk and consistent broadcast advertising campaign throughout Massachusetts. Implementation of this phase of the Company's advertising and outreach campaign will commence with advertising on broadcast TV stations in lieu of cable TV due to the lack of low-income viewership of cable. Current broadcast plans call for the Company to begin advertising on broadcast TV stations throughout the Commonwealth. In addition, the Company will specifically target stations with affiliate TV and radio stations.

D.T.C. 1-11 Nexus states on page 4 of its Application that it intends to “provide the nine supported services through a combination of its own facilities, and the resale of another carrier’s services, consistent with the FCC’s rules and orders.” Identify:

A. All facilities owned in whole or in part by Nexus, their locations, and provide a description of same. If Nexus shares ownership of the facility, also identify all co-owners and provide documentation detailing such co-ownership.

**Response:**

Nexus will provide CONFIDENTIAL **Exhibit 6** in response to the above D.T.C. request upon finalizing confidentiality protections with the Commission’s Hearing examiner.

B. Each carrier whose services Nexus will resell and provide documentation for same, including agreements governing such resale.

The confidential nature of the Company’s wholesale agreements with its underlying carriers for wireless service are barred from disclosure due to the existence of a non-disclosure agreement between the parties that prohibit disclosure.

D.T.C. 1-12 Certify whether Nexus is in a position to immediately offer each of the services supported by federal universal service support mechanisms pursuant to 47 USC § 254(c) and 47 CFR § 54.101.

**Response:**

Nexus will provide each of the services supported by federal universal support mechanisms pursuant to 47 USC § 254(c) and 47 CFR § 54.101 and will do so immediately upon designation as an ETC. As requested, the required certification is provided in the attached **Exhibit 3**.



D.T.C. 1-13 Describe whether Nexus has any unique advantages, characteristics, or features to its proposed service offerings as compared to the service offerings of the incumbent local exchange carrier (i.e., Verizon) and other ETCs (e.g., Virgin Mobile USA, L.P., RCN of Massachusetts, Taconic Telephone Corporation, and TracFone) in the designated area.

**Response:**

Nexus provides eligible customers with unique advantages through the variety of plans and options that meet the needs of each individual, with the significant advantage of mobility and nationwide minutes, options not available with the incumbent local exchange carrier's plans.

Nexus' Massachusetts customers will be able to choose from Nexus standard national wireless plans (indicated below), which provide a variety of options in order to best meet the needs of the particular consumer:

Plan*	"Free" Minutes**	Unused Minutes/SMS	Rate for Domestic Text	Rate International Text
1	250	Neither carry over to next month	One text per airtime minute	None
2	125	Both carry over to next month	One text per airtime minute	\$0.20 per text sent or received
3	68	Both carry over to next month	Two texts per airtime minute*	\$0.20 per text sent or received

\* Standard national plans; number of minutes same in all states; other variances per state law or order of state commission.

\*\* "Free" refers to the out-of-pocket cost to qualified Lifeline subscribers after application of the discount.

The free minutes will automatically be added to each subscriber's prepaid account each month. Subscribers who wish to purchase additional airtime, may choose from one of the following airtime cards:

Card Denomination	Minutes	Per Minute Rate
\$3.00	20	\$0.15
\$5.00	40	\$0.13
\$10.00	120	\$0.08
\$20.00	300	\$0.07
\$30.00	500	\$0.06
\$45.50	Unlimited voice and text	Not applicable

\$50.00	950	\$0.05
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The Unlimited Airtime Card will provide the subscriber unlimited airtime and text for thirty (30) calendar days starting from the date the card is loaded. The card may be purchased at any time during the month. All minutes from this card may be used for local and domestic long distance calling and unlimited text messaging. Once the subscriber loads a first Unlimited Airtime Card to his or her account, the subscriber will need to purchase an additional Unlimited Airtime Card and load it to his or her account within the initial thirty (30) days-period in order to continue to receive uninterrupted access to unlimited airtime.

All Nexus minutes—the monthly “free” minutes and additional airtime minutes—are anytime, nationwide minutes and can be used for domestic calls (i.e., “local” and intrastate/interstate “long distance” calls).

Nexus subscribers may add minutes to their account by purchasing additional airtime cards at participating retail outlets or by making credit card purchases by calling 611 for free, or by calling Nexus’ toll free customer care number from their wireless phone or on-line at [www.Reachoutwireless.com](http://www.Reachoutwireless.com)

The choice of plans along with the ability to obtain additional minutes as needed, provide customers with the flexibility to meet their individual needs, and tailor their number of total minutes on a month-by-month basis.

Nexus also points out that it has chosen to make Lifeline its primary marketing focus and provides free E911 compliant wireless handsets to qualifying low-income subscribers. Nexus also regularly engages in grassroots outreach efforts to provide affordable telephone service to the very poorest Americans including in-person assistance in vans deployed to poor neighborhoods as well as kiosks, reaching neighborhoods untouched by other carriers that may rely heavily on websites and stands in big box stores (stores that are rarely located in the poorest neighborhoods). The same, however, cannot be said for the majority of other ETCs. For example, although Virgin Mobile actively participates in the low-income program, only approximately six percent (6%) of its customer base participates in the program. Unlike Nexus, Lifeline is clearly a relatively small segment of the overall business of most other ETCs.

In addition, Nexus’ service is prepaid, which allows consumers to obtain wireless service without a credit check, deposit or term agreements. This payment model is the standard throughout much of the rest of the world and provides a simple yet very effective tool to manage the family budget.

D.T.C. 1-14 Pursuant to 47 CFR § 54.202, certify whether Nexus will provide service on a timely basis and within a reasonable period of time as required by § 54.202(a)(1)(i)(A), (B).

**Response:**

Upon designation as an ETC, Nexus will provide on a timely basis and within a reasonable period of time as required by 47 CFR § 54.202(a)(1)(i)(A), (B). As requested, the required certification is provided in the attached **Exhibit 3**.

D.T.C. 1-15 Pursuant to 47 CFR § 54.202(a)(1)(ii), submit a five-year plan that describes with specificity proposed improvements or upgrades to the Company's network on a wire center-by-wire center basis throughout its proposed designated service area.

**Response:**

According to 47 C.F.R. § 54.202(a)(1)(ii), the five-year plan is designed to describe "with specificity proposed improvements or upgrades to [an] applicant's network" and to "demonstrate how signal quality, coverage or capacity will improve due to the receipt of high-cost support..." The plain reading of this rule clearly establishes that requirement for a five-year plan is tied to the receipt of high-cost funding and is not applicable to an ETC that seeks designation solely for the receipt of low-income support. In the instant case currently before the Commission, Nexus is seeking designation solely to provide Lifeline and Link-Up support to qualified low-income consumers, and to seek reimbursement for the same. As such, the requirement to submit a five-year plan is not applicable to Nexus' Petition or to the Petition of any other applicant that limits its designation request to low-income support.

D.T.C. 1-16 Pursuant to 47 CFR § 54.202(a)(2), and referenced on page 4 of its Application, describe the Company's ability to remain functional in emergency situations, including its contingency plans in the event of an emergency. Provide a detailed explanation of the Company's role in providing access to a reasonable amount of back-up power, including the length of time a cell site can be expected to run exclusively on battery power; rerouting of traffic around damaged facilities; the number of service technicians available to respond to emergency situations; and the capability of managing traffic spikes resulting from emergency situations.

**Response:**

With regard to 47 C.F.R. § 54.202(a)(2), all of the Company's own facilities are housed in Tier 1 collocation centers. Each of these sites was chosen based on its ability to remain functional in emergency situations for extended periods of time and provide backup power that is independent of a municipal power supply. Site selection was also based on the availability of circuits and trunks used to route and transmit traffic. Each site has both primary and backup circuits. In the event of a failure of the primary circuit, traffic will immediately and automatically switch over to backup circuits. As a result, customer traffic will continue without impediment. All backup power and secondary circuits are tested at regular intervals.

Nexus' ability to remain functional in emergency situations is also dependent, in part, on its carrier vendor for spectrum and related wireless services. As such, Nexus' selection of vendor was based not only on wireless coverage, but also on that carrier's ability to remain functional in emergency situations. It is Nexus' understanding that all of cell sites and facilities owned by the vendor have sufficient backup power that is both independent from a municipal power supply and provide sufficient backup power to permit the facility to remain functional until municipal power can be restored. It is also Nexus' understanding that all sites, including mobile switching centers, have redundant transport and routing capabilities.

D.T.C. 1-17 State whether Nexus will rely on its own facilities and equipment, other carrier's facilities, or a combination to provide access to 911 and E911 services. Provide all agreements which will allow Nexus to provide its subscribers 911 and E911 access.

**Response:**

Nexus will provide CONFIDENTIAL **Exhibit 7** in response to the above D.T.C. request upon finalizing confidentiality protections with the Commission's Hearing examiner.

D.T.C. 1-18 Pursuant to 47 CFR § 54.202(a)(3), describe Nexus' ability to satisfy applicable consumer protection and service quality standards set forth in the Department's *Rules and Practices Relating to Telephone Service to Residential Customers* (D.P.U. 18448 (1977)). Provide copies of Nexus' employee training materials and company policies regarding handling customer complaints.

**Response:**

Nexus has complied with the CTIA-the Wireless Association's Consumer Code for Wireless Service ("Consumer Code") since its inception and will continue to comply with the Consumer Code once designated as an ETC in the Commonwealth. Compliance with the Consumer Code also satisfies its obligations under the FCC's regulations per 47 C.F.R. § 54.202(a)(3).

To the extent the Department's Rules and Practices pertain to billing and payment practices, security deposits and discontinuance of service, Nexus respectfully submits that these provisions would not apply to prepaid service. Nexus Lifeline services are exclusively prepaid, which means that a customer must elect to add money to his or her account to use service. Nexus offers free minutes from a choice of three plans, allowing the customers to purchase additional minutes at their option. A handset is provided free of charge and no security deposit is required. A customer may discontinue service at any time without penalty by contacting Nexus.

D.T.C. 1-19 Pursuant to 47 CFR § 54.202(a)(4), demonstrate that Nexus offers a local usage plan comparable to the one offered by the incumbent local exchange carrier (i.e., Verizon) in the service area for which Nexus seeks designation. Provide a detailed description of the local usage plan Nexus will offer in Massachusetts.

**Response:**

The above-cited FCC rule, where adopted by a state, requires an ETC to “[d]emonstrate that it offers a local usage plan comparable to the one offered by the incumbent LEC in the service areas for which it seeks designation.”<sup>2</sup> However, the FCC has explained that the local usage plan(s) of an ETC applicant should be reviewed on a case-by-case basis.<sup>3</sup> It has pointedly declined to adopt any minimum number of minutes in connection with this regulation, and therefore, an ETC is required to offer a local usage plan that is “comparable,” not identical. Given that all Nexus’ airtime minutes may be used on a nationwide basis, all such minutes may be used to make “local” calls, at the subscriber’s option.

Some additional background on the FCC’s rules may be helpful. With respect to wireless service, to date, the FCC has not quantified an amount of local usage that is required to be included by an ETC as a part of its universal service offering.<sup>4</sup> In the First Report and Order, the FCC deferred a determination on the amount of local usage that a carrier would be required to provide.<sup>5</sup> In a subsequent rulemaking docket, the FCC sought comment on a definition of the public service package that must be offered by all ETCs, including how much local usage should be required to be provided to customers as a part of a universal service offering.<sup>6</sup> After considering public comments and recommendations of the Joint Board, the FCC, in July 2003, released an order declining to impose a specific amount of local usage as a condition of ETC status.<sup>7</sup>

Recently, the FCC again sought comment on another set of recommendations by the Joint Board regarding ETC criteria and again declined to specify a minimum quantity of local usage.<sup>8</sup> Instead, the FCC has determined that when a carrier offers a choice of rate plans containing varying amounts of local usage, it meets the local usage requirement.<sup>9</sup>

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<sup>2</sup> See 47 CFR § 54.202(a)(ii)(4).

<sup>3</sup> See *Federal-State Joint Board on Universal Service*, Report and Order, 20 FCC Rcd 6371, 6385, ¶ 33 (2005).

<sup>4</sup> See *NPCR, Inc., d/b/a Nextel Partners*, 19 FCC Rcd 16530, 16536 (2004) (“Nextel Partners”).

<sup>5</sup> See *Federal-State Joint Board on Universal Service*, Report and Order, 12 FCC Rcd at 8776, 8809-25 (1997).

<sup>6</sup> See *Federal-State Joint Board on Universal Service*, Memorandum Opinion and Order and Further Notice of Proposed Rulemaking, 13 FCC Rcd 21252, 21279-81 (1998).

<sup>7</sup> See *Federal-State Joint Board on Universal Service*, Order and Order on Reconsideration, FCC 03-170 at ¶ 14 (rel. July 14, 2003).

<sup>8</sup> See *Federal-State Joint Board on Universal Service*, Notice of Proposed Rulemaking, 19 FCC Rcd 10800, 10826-27 (2004).

<sup>9</sup> See e.g. *Sprint Corp.*, DA 04-3617 at ¶ 11 (rel. Nov 18, 2004); *ALLTEL Communications, Inc.*, 19 FCC Rcd 20496, 20500-01 (2004); *Nextel Partners, supra*, 19 FCC Rcd at 16536.



Consistent with the FCC's pronouncements, Nexus provides eligible customers with more than sufficient number of minutes through the variety of plans and additional airtime cards that meet the needs of each individual.

D.T.C. 1-20 Pursuant to 47 CFR § 54.202(a)(5), certify that Nexus acknowledges that the Department may require it to provide equal access to long-distance carriers in the event that no other eligible telecommunications carrier is providing equal access within the service area.

**Response:**

Nexus acknowledges that the Department may require it to provide equal access to long-distance carriers in the event that no other ETC is providing equal access within the service area.

As requested, the required certification is provided in the attached certification in **Exhibit 3**.

D.T.C. 1-21 Identify the rates (or charges) for each service offered by Nexus under 47 USC § 254(c) and identified in 47 CFR § 54.101(a).

**Response:**

Please see Nexus' response to 1-13 above for details regarding its service plans and additional airtime cards.

All rate plans will provide subscribers with access to all nine (9) of the services or functionalities supported by federal universal service support mechanisms, which are 1) Voice grade access to the public switched network; 2) Local usage; 3) Dual tone multi-frequency signaling or its functional equivalent; 4) Single-party service or its functional equivalent; 5) Access to emergency services; 6) Access to operator services; 7) Access to interexchange services; 8) Access to directory assistance; and 9) Toll limitation for qualifying low-income consumers.

D.T.C. 1-22 Provide the following for Nexus' Lifeline service plan(s):

A. Pricing.

**Response:**

All of the Company's wireless Lifeline plans will be provided with no out-of-pocket payments required of qualified Lifeline subscribers. For additional pricing information, please see Nexus' response to 1-13 above.

B. Cost per minute for each plan.

**Response:**

Please see responses to 1-13 and 1-22(A) above.

C. Whether the minutes expire.

**Response:**

Minutes included with the 250 minute plan expire at the end of the month, if unused. Minutes included with the 125 and 68 minute plan carry over to the following month.

D. All custom-calling features included in each plans, including, but not limited to caller-ID, call waiting, call forwarding, three-way calling, voicemail, and texting, and the cost of each feather and whether there will be a recurring charge for such features and the cost of the same.

**Response:**

All of the Nexus' wireless Lifeline service plans include call waiting, caller ID and standard voice mail at no additional monthly charge. In addition, all of the Company's wireless Lifeline service plans allow subscribers to use voice minutes to send and receive SMS text messages.

E. All additional charges, fees, and/or taxes not contemplated in A. through D. above.

**Response:**

Not applicable.

F. Where, if at all, Lifeline customers could incur roaming charges within Massachusetts.

**Response:**

Roaming charges only apply if a call is attempted outside a "home" coverage area. Nexus' customer service informs all new subscribers that roaming charges may apply if the subscriber makes or receives calls outside of the subscriber's designated calling area. Due to the extensive geographical area that encompasses Nexus' designated calling area, qualifying low-income consumers who reside within in the geographic area served by non-rural Verizon, Granby and Richmond wire centers should most likely not incur roaming charges.

G. How roaming charges will apply to Lifeline customers.

**Response:**

Roaming charges only apply if a call is attempted outside a "home" coverage area. The applicable roaming rate for calls placed and received outside of the subscribers designated calling area is currently set at \$0.59 per minute. When incurred, roaming charges are first calculated by multiplying the number of applicable roaming minutes by the roaming rate of \$0.59 per minute. This total is deducted from the subscribers available monetary account balance. For example, if a subscriber has an account balance of \$15 and incurs 3 minutes of roaming usage, the 3 minutes will first be multiplied by the applicable roaming rate of \$0.59 for a total roaming charge of \$1.77. This amount is then deducted from the monetary value of the subscriber's account balance of \$15 leaving an updated account balance of \$13.23.

H. Whether Lifeline customers will be notified that they are about to incur roaming charges.

**Response:**

If a Nexus Lifeline subscriber were to travel into an area that requires roaming the subscriber's handset display automatically visually informs the Nexus subscriber when they are within an area in which roaming charges are applicable. In this situation the handsets will automatically display the word "Roam" or "RM" on the LED of the phone.

I. Whether Nexus requires Lifeline customers to affirmatively request the availability of roaming service before roaming charges will be imposed.

**Response:**

Nexus' subscribers do not need to affirmatively request roaming. Nexus' customer service informs all new subscribers about the fact that roaming charges may apply if the subscriber makes or receives calls outside of the subscriber's designated calling area. Customers are made aware that these additional charges will apply if calls are either sent or received from the handset outside the home area.

J. Whether a Lifeline customer can request that roaming calls be deactivated.

**Response:**

Nexus' customer service informs all new subscribers about the fact that roaming charges may apply if the subscriber makes or receives calls outside of the subscriber's designated calling area. Customers are also made aware that at the time of provisioning the service Roaming ability can be requested to be blocked, thereby eliminating the possibility of incurring unwanted additional charges.

K. Whether charges will be incurred for 911 calls, including roaming charges.

**Response:**

Calls to 911 do not reduce the subscriber's balance of minutes, including those 911 calls made while roaming.

D.T.C. 1-23 Identify the handset(s) that Nexus will provide to Lifeline subscribers pursuant to 47 C.F.R. § 54.101(a)(3), state the amount that Nexus will charge for same, and provide the technical specifications for same.

**Response:**

Nexus will provide all eligible Lifeline and Link-Up subscribers with a free E911 compliant handset shipped to the subscriber at no charge. Current business plans calls for Nexus to provide free Motorola W315, Audiovox 8910, Kyocera KE414, LG VX3300, Nokia 2366i, or Samsung N330 handsets, however the handset model provided by the company may vary. All handsets provided to customers, whether new or refurbished, will be E-9-1-1 compliant and will come with a manufacturer's warranty if applicable. Handsets, which fail to operate upon receipt of the subscriber due to any defect not a result of customer misuse, will be replaced at no charge to the customer. Warranty periods for new OEM handsets can vary by manufacture and can range from 90 days to 1 year. The warranty is clearly indicated in the instruction manual provided with all new OEM handsets.

The welcome kit supplied with the handset to all new Lifeline and Link-Up subscribers will also include a toll free number to be used to report defective handsets. Customers will be directed to send defective handsets to Nexus. At the Company's option, defective handsets will be repaired or replaced and shipped back to the customer at no charge.

D.T.C. 1-24 Provide a copy of Nexus' Articles of Incorporation and a Certificate of Good Standing from the state in which Nexus is incorporated.

**Response:**

Please see attached **Exhibit 8**.



D.T.C. 1-25 State whether Nexus is a publicly traded company. If so, provide copies via CD or Internet link of all 10-Ks and 10-Qs (with any amendments) filed with the U.S. Securities and Exchange Commission during the last three years. If Nexus is not a publicly-traded company, provide its financial statements for the last three years.

**Response:**

Nexus will provide CONFIDENTIAL **Exhibit 9** in response to the above D.T.C. request upon finalizing confidentiality protections with the Commission's Hearing Examiner.

D.T.C. 1-26    Certify whether Nexus has any outstanding tax liabilities or other late payments or liabilities due and owing to the Commonwealth of Massachusetts. If so, provide complete and detailed documentation identifying the amounts owed and explaining the reasons for such arrears.

**Response:**

Nexus has not begun to do business in the Commonwealth of Massachusetts and does not have any outstanding tax liability, late payments, or other such liabilities in this jurisdiction, as certified by **Exhibit 3**.

D.T.C. 1-27    Certify whether Nexus has any outstanding tax liabilities or other late payments or liabilities due and owing to any government and/or quasi-public entities in any other jurisdictions. If so, provide complete and detailed documentation identifying the amounts owed and explaining the reasons for such arrears.

**Response:**

Nexus has no outstanding tax liabilities, late payments, or other such liabilities in any jurisdiction, as certified by **Exhibit 3**.

D.T.C. 1-28 Describe in narrative form how Nexus will verify a customer's eligibility for the USF's Lifeline program, including its procedures for auditing its list of enrolled customers. Also provide samples of Nexus' certification and verification forms.

**Response:**

Nexus has direct contact with all prospective customers, including interactions to determine eligibility relative to the Lifeline program, a determination Nexus makes prior to activating the service. Nexus will use the DTC's certification form found at [http://www.mass.gov/Eoca/docs/dtc/telecom/forms/Lifeline\\_Application9\\_2010.pdf](http://www.mass.gov/Eoca/docs/dtc/telecom/forms/Lifeline_Application9_2010.pdf).

A Nexus Lifeline specialist will review the application to ensure compliance with state Lifeline requirements. Upon approval, a free handset is shipped to the applicant with the initial amount of free minutes preloaded.

Nexus, a wireline and wireless ETC in twenty-five states, is a leader in the industry at implementing internal policies to eliminate waste, fraud and abuse in the Low Income program. Since commencement of Nexus' wireline Lifeline program in 2006 (and subsequent wireless Lifeline program in 2009), Nexus has consistently adhered to a one-per-residential address limitation for both Link-up and Lifeline without regard to whether or not that limitation was specifically codified in the Commission's rules.

Nexus has also consistently obtained from all prospective subscriber's their date of birth and the last four digits of the applicant's social security number ("DOB/SSN"), in order to assist Nexus in verifying eligibility and identity, a restriction that Nexus has voluntarily self-imposed on the company's Lifeline operations as a means of assisting in certification and eligibility to obtain Lifeline and Link-Up discounts.

By implementing the processes developed internally Nexus has been able to ensure that enrollment in its Lifeline program is limited to one per household. Nexus has designed the company's Lifeline and Link-Up enrollment system to identify any attempts to enroll more than one Lifeline account (or utilize Link-Up more than one time ) at a single address. All addresses provided by Lifeline applicants must be provided by the applicant in United States Postal Service standard format. Doing so ensures that a unique bar code based on the Delivery Point Validator is stored in the Nexus system. Whenever such an address is provided by an applicant and entered in Nexus' system, the system captures the bar code information and compares the address information against Nexus' entire customer base. Addresses provided by applicants that are not in the USPS standard format are not acceptable.

Nexus has established safeguards to prevent potential subscribers who are intent on committing fraud and attempt to obtain multiple Nexus Lifeline-supported services at the same address. Nexus utilizes this information to scrub the application against Nexus' database of existing and former Lifeline subscribers. Nexus's data-base driven

safeguards are incorporated in Nexus's computer system used to process Lifeline applications.

When reviewing completed applications, Nexus's computer system identifies when an address on an application matches an address that is already associated with a Lifeline customer. The computer program will alert Nexus if there is a Lifeline application including an address similar to an address already associated with a current Lifeline customer. For example, the computer program will look for addresses that only differ by an apartment number, such as 100 Main Street and 100 Main Street, Apartment A. When the computer program informs Nexus of any situations that may indicate fraud, Nexus will contact the Lifeline applicant to verify or obtain any necessary information prior to approving the applicant for Lifeline service. If an address submitted by a Lifeline applicant is associated with a customer that already receives Lifeline service, Nexus internal filtering system automatically prevents the application from continuing through the enrollment process. Nexus' process of fully vetting all applicants' information will ensure that only qualified individuals receive Lifeline service and that only one Nexus Lifeline supported service is provided to each qualified household. Nexus' internal Safeguard system is utilized on every new application on every subscriber who seeks service from Nexus, irrespective of enrollment method.

D.T.C. 1-29 State whether Nexus will abide by the following conditions agreed to by Virgin Mobile in *In the Matter of the Application of Virgin Mobile USA, L.P.'s Petition for Limited Designation as an Eligible Telecommunications Carrier*, D.T.C. 10- 11, Order Approving Petition (Sept. 9, 2011):

- A. Provide quarterly reporting to the Department of customer accounts terminated for inactivity.

**Response:**

Nexus agrees to provide this information.

- B. Provide reporting of consumer complaints to the Department regarding its Lifeline service and agree to participate in dispute resolution by the Department's Consumer Division.

**Response:**

Nexus agrees to provide and agrees to participate in dispute resolution by the Department's Consumer Division.

- C. Provide reporting to the Department of USF support received for Massachusetts consumers.

**Response:**

Nexus agrees to provide this information.

- D. File with the Department, within 60 days of the approval of its Petition, its terms and conditions of service, applicable to qualifying Lifeline service customers. Agree to an ongoing obligation to notify the Department of any future changes to its rates, terms, or conditions.

**Response:**

Nexus agrees and will file, within 60 days of approval of its Petition, a complete listing of its terms and conditions of service and will file with the Department of any future changes to its rates, terms and conditions.

- E. Include the Department's contact information for consumer complaints in its marketing materials for its Lifeline service.

**Response:**

Nexus agrees to provide the Department's contact information for consumer complaints in its marketing materials.

- F. Provide Public Safety Answering Points (PSAP) self-certification to the Department.

**Response:**

The public safety answering points (PSAP) self-certification requirement was originally imposed by the FCC on resale providers as a condition for forbearance from the facilities requirements of Section 214(e)(1) of the Telecommunications Act of 1934, as amended (the "Act"); 47 C.F.R. § 54.201(d)(1). Carriers that provide the supported services exclusively through resale of another carrier's services fall under the classification of a "pure reseller" making them ineligible for designation as an ETC. As a result, pure resellers are compelled to seek forbearance from the FCC to overcome the facilities requirement of 47 C.F.R. § 54.201 to receive ETC designation. Although the FCC has granted recent request for forbearance, it has done so with specific limitations.

Nexus complies with the Federal requirement that an ETC offer service over its own facilities. Nexus' service complies with FCC Rule 54.201(d) which states that a common carrier "either using its own facilities or a combination of its own facilities and resale of another carrier's services" shall be "eligible to receive universal service support" throughout the service area "for which the designation is received."<sup>10</sup>

Nexus, in contrast to "pure resellers" provides the supported services either using its own facilities or a combination of its own facilities and resale and therefore need not seek forbearance from the provisions of 47 C.F.R. § 54.201. The Company directly meets the FCC's requirements for ETC designation by offering the "services that are supported by federal universal support mechanisms...*either using its own facilities or a combination of its own facilities and resale of another carrier's service.*"<sup>11</sup> Whenever a carrier relies, at a minimum, on the "combination" standard, a commission must grant ETC designation "irrespective of the technology" deployed by the applicant.<sup>12</sup> As such, Nexus is classified as a facilities-based provider and does not need to seek forbearance from the FCC. Nor is it required

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<sup>10</sup> See 47 C.F.R. § 54.201(d)(1).

<sup>11</sup> 47 C.F.R. § 54.201(d)(1). (Emphasis added.)

<sup>12</sup> 47 C.F.R. § 54.201(h).

to adhere to requirements that are a condition of forbearance such as the PSAP self-certification requirement.

- G. Require all customers to contact Nexus directly to self-certify, under penalty of perjury, that they qualify for Lifeline service and that the customer's household is not already receiving Lifeline service.

**Response:**

Nexus agrees to seek such self-certifications from all customers.

- H. Implement a 60-day inactive account (non-use) policy whereby if a customer account is inactive for 60 days, Nexus will suspend the collection of the USF support for the account during the pendency of a subsequent 30 day grace period during which Nexus will attempt to re-engage the customer. In the event Nexus cannot re-engage the customer, Nexus will discontinue the customer's service so that it does not receive USF support for the grace-period.

**Response:**

Nexus agrees to implement this 60-day policy, which is something that Nexus has already voluntarily adopted on a company-wide basis.



## EXHIBIT 1

## **EXHIBIT 1**

### **West Virginia**

In its Order dated December 3, 2009, the Public Service Commission of West Virginia approved Nexus' application for designation as an Eligible Telecommunications Carrier for the sole purpose of providing Lifeline and Link Up service to qualifying low-income West Virginia consumers. In addition to the reporting requirements applicable to all ETC's, the Commission approved Nexus' application subject to the following conditions:

- (a) Nexus shall provide E911 compliant handsets to all Lifeline customers and non-compliant handsets in the possession of existing Nexus customers will be replaced with E911 compliant handsets at no charge to the customers upon their enrollment in the Lifeline program.
- (b) Each of Nexus' Lifeline customers in West Virginia shall receive 68 minutes of airtime each month for all months in which the customers are enrolled in the program and any unused minutes will roll over to the following month (it is important to note that Nexus has subsequently begun offering Lifeline eligible subscribers a choice of rate plans that contain varying amounts of local usage, which include specified amounts of airtime each month for all months in which the customer is enrolled in the program. However, unused minutes included with the 68 minute plan continue to roll over to the following month);
- (c) Nexus shall waive any monthly maintenance fees for Nexus' Lifeline customers in West Virginia;
- (d) Nexus shall waive the balance of Nexus' customary SAF not covered via Link-Up to ensure there will be zero deferred activation charges for all Nexus' Lifeline customers in West Virginia;
- (e) Nexus shall inform all newly enrolling Nexus' Lifeline customers in West Virginia of the applicability of Roaming Fees if a subscriber roams outside of the home coverage area.

### **New Jersey**

In its Order dated April 28, 2010, the New Jersey Board of Public Utilities approved Nexus' petition for designation as an ETC. In addition to the usual state certification and reporting requirements applicable to all ETC's, Nexus approval is subject to the following conditions:

- (a) Certification from the state Office of Emergency Services on behalf of each PSAP in New Jersey, confirming Nexus provides its customers with access to basic E911 regardless of activation status and the availability of prepaid minutes.
- (b) Certification that the handsets provided to Nexus customers are E911 compliant;
- (c) Each of Nexus' Lifeline customers in New Jersey will receive 68 minutes of airtime each month for all months in which the customer is enrolled in the program and any unused minutes will roll over to the following month (it is important to note that Nexus has subsequently begun offering Lifeline eligible subscribers a choice of rate plans that contain varying amounts of local usage, which include specified amounts of airtime each month for all months in which the customer is enrolled in the program. Unused minutes included with the 68 minute plan continue to roll over to the following month);
- (d) Tracking of Lifeline customer's primary residential address and certification that there is only one customer receiving Lifeline at each residential address;
- (e) Nexus shall ensure that 100% of federal universal service funds flow through directly to Lifeline customers;
- (f) Nexus shall make all service offerings, including Lifeline, available on its Web site;
- (g) Nexus shall file its terms and conditions of service, applicable to qualifying low-income customers. Further, Nexus shall notify the Board of any future changes to its rates and terms or conditions;
- (h) Nexus shall file proposed language to be used in all advertising of Lifeline service and on its Web site.
- (i) Nexus must reach satisfactory resolution of complaints filed with the Board's Telecommunications Division on a timely basis; and
- (j) With regard to Link-Up, Nexus will apply the \$30.00 Link Up support to the Company's customary charge for service activation, resulting in a \$42.00 net charge to the customer. Nexus agreed to waive the \$42.00 balance.

**Georgia**

In its Order dated May 20, 2010, the Georgia Public Service Commission granted the Application of Nexus Communications, Inc., for Designation as an Eligible Telecommunications Carrier for the purpose of providing low-income support to qualified households. In addition to the reporting requirements applicable to all ETC's, Nexus grant is subject to the following conditions:

- (a) Nexus shall make all service offerings, including Lifeline/Link-Up, available on its internet website;
- (b) Nexus shall file its terms and conditions of service and rate plans including its Link-Up and Lifeline discounts available to qualifying low-income customers and will notify the Commission of future changes to its rates, terms and conditions;
- (c) Nexus shall file proposed language to be used in advertising all Lifeline/Link-Up services on its website and will include information directing customers to the Commission's Consumer Affairs unit for complaints regarding service issues;
- (d) The same conditions applicable to the designation of Alltel, to the extent those conditions apply to Lifeline service. These include:
  - (1) A report of all instances in which the company refuses to serve a customer, including the specific location of the customer by street address, the rationale for refusal and the company's progress with establishing interconnection arrangements which permit resale of either wireless or ILEC services in the customer's location;
  - (2) Estimated federal funds for the coming year and actual federal funds received in the previous year;
- (e) Nexus' designation is further conditioned upon satisfactory resolution of complaints filed with the Commission's Consumer Affairs Unit.

On October 20, 2010, the Georgia Public Service Commission issued an order amending the designation of Nexus Communications and TracFone Wireless. Specifically, the amending order included the following conditions:

- (a) Each company is required to file a 60-day non-usage policy that will ensure that federal Universal Service Fund support is not collected in connection with a customer that has lost his or her wireless phone or has failed to contact the company when he or she no longer desires service.
- (b) Each company is required to file with the Commission quarterly reports detailing the number of customers that have been deactivated for not having activity in a 60-day period, the number of customer that did not

pass annual verification and the number of customers that were voluntarily deactivated.

### **Mississippi**

In its Order dated October 5, 2010, the Mississippi Public Service Commission granted the Petition of Nexus Communications, Inc., for supplemental authority to provide the supported services via the Company's wireless telecommunications service in addition to the Company's current wireline offering. In addition to the reporting requirements applicable to all ETC's, Nexus grant is subject to the following conditions:

- (a) Nexus will certify all Lifeline applicants are eligible to receive Lifeline benefits in accordance with the Commission's rules;
- (b) Nexus shall allow its customers to contact customer service by dialing \*611 without having minutes deducted by third quarter of 2011 (Nexus has complied with the requirement in all jurisdictions);
- (c) If the service can be feasible implemented, Nexus shall make available discounted versions of a high volume calling plan as an additional service plan, to meet the needs of high volume Lifeline customers;
- (d) Nexus shall provide staff with a list of its Lifeline customers by name and address in a DVD as a part of its second and fourth quarter reports;
- (e) Nexus shall comply with applicable Commission Rules of Practice and Procedure regarding discontinuance of service;
- (f) Nexus shall file an informational tariff with the Commission describing the terms and conditions of its prepaid wireless service;
- (g) Nexus shall file any changes to its rates, terms, or conditions with the Commission at least seven days prior to the effective date of the change;
- (h) Nexus shall file the language it will use in its advertising of its Lifeline service and on its website. This shall also include Nexus' application form;
- (i) Nexus shall not commence the offering of service until it has complied with the conditions specified in (f) and (h);
- (j) Nexus shall comply with applicable quarterly and annual ETC reporting requirements;

- (k) Nexus may not seek reimbursement for a Lifeline and Link-Up customer from the FCC of credit for the same obtained from the underlying carrier.

### **California**

In its Order dated May 5, 2011, the California Public Utilities Commission granted the request of Nexus to be designated as an Eligible Telecommunications Carrier providing only Federal Lifeline and Link Up services within the service areas of Verizon California and AT&T California. In addition to the reporting requirements applicable to all ETC's, Nexus grant is subject to the following conditions:

- (a) Nexus shall offer its wireless Federal Lifeline service in the Verizon and AT&T service areas. Nexus shall file a new request for ETC designation if it wants to expand its service offerings in the service area not covered in this Resolution;
- (b) Nexus shall implement its "systematic verifiable mechanism" to ensure that its Lifeline service offering is extended only to customers in its designated service area.
- (c) Nexus is authorized a waiver from the G.O. 153 basic service elements of Lifeline until such time that the Commission has establishes additional rules for wireless such as, but not limited to, Lifeline and basic service definition. The authorized waiver will have no bearing on Lifeline offerings under state law.
- (d) Nexus shall comply with G.O. 153's certification and verification with Solix to establish customer's Lifeline eligibility, and not be allowed to begin to offer Lifeline service to customers until the verification and certification process has been put into place with the 3rd party administrator and is operational. Nexus shall be required to inform the Communications Division Director within five business-days of when these processes are put into place and are operational.
- (e) Nexus shall clearly label its Lifeline offering as Federal Lifeline to minimize customer confusion between State and Federal Lifeline programs. Nexus shall also provide adequate information about the potential coverage and service quality issues a customer may encounter if s/he opts to select a federal wireless Lifeline plan versus a State Lifeline wireline plan. And Nexus, prior to publication, shall provide to CD staff copies of all marketing materials for review of message clarity.
- (f) Nexus shall continue to comply with Commission rules, including the payment of PPP surcharges and user fees. Failure to do so may result in revocation of WRI and ETC designation in California.

- (g) Nexus shall provide the CD Director within 30 days of receipt from USAC a copy of Nexus' certification with the USAC.

### Ohio

In its Order dated June 22, 2011, the Public Utilities Commission of Ohio ("PUCO") in Case No. 10-432-TP-UNC granted Nexus conditional designation as an ETC for the limited purpose of offering wireless Lifeline subject to the following conditions:

- (a) ETC designation is granted for an interim one-year period. At the conclusion of this interim period, the PUCO will review the company's operations for compliance with the FCC's ETC requirements and requirements of the PUCO's order to determine if renewal is appropriate;
- (b) In order to ensure that federal USF payments are not being made for inactive phones, Nexus must track the number of unused minutes for each phone that it seeks USF Lifeline reimbursement;
- (c) Nexus must notify the Commission should it modify the terms of its Compliance Plan;
- (d) Nexus must maintain the following Ohio-specific information on a monthly basis and informally provide the Commission staff with quarterly reports reflecting data for that time frame;
  - (1) How many applications did Nexus receive for Lifeline service?
  - (2) How many Lifeline service applications did Nexus approve? The response should include a numerical breakdown of the basis for approval (e.g., the number of applications approved based on income eligibility or program-based eligibility).
  - (3) What is the current total number of Lifeline customers served by the company?
  - (4) What is the number of customers subscribed to each individual plan (e.g., 68 minutes, 125 minutes, and 250 minutes)?
  - (5) How many applications for Lifeline service were denied? The response should include a numerical breakdown of the basis for denial (e.g., address found to be receiving other Lifeline benefits, improper documentation, or incomplete documentation)?
  - (6) How many handsets were deactivated after 60 days of non-usage? For the purpose of this question, deactivated implies that Nexus is no longer receiving Lifeline support from the USF for the handset.

- (7) How many handsets have been deactivated on a monthly basis due to the failure of subscribers to recertify or verify? For the purpose of this question, deactivated implies that Nexus is no longer receiving Lifeline support from the USF for the handset.
  - (8) How many telephone subscribers, whose handset were deactivated, re-enrolled for service at a subsequent period of time?
  - (9) What is the number and percentage of Lifeline customers who deplete the standard 68,125, and 250 minutes by the end of the month? What is the number and percentage of Lifeline customers who deplete the standard 68,125, and 250 minutes within the first two weeks of the month?
  - (10) The number of subscribers under the 68,125, and 250 minutes plans who purchased additional minutes.
  - (11) The average number of additional minutes purchased under the 68,125, and 250 minute plans.
  - (12) The percentage of minutes used for voice and text under the 68,125, and 250 minute plans.
  - (13) What is the average number of unused minutes under the 68,125, and 250 minute plans.
  - (14) What is the number of contacts to Nexus from Ohio customers each month? The response should include a numerical breakdown of the reason for the contact (e.g., coverage availability, service denied, did not receive a phone, did not receive monthly minutes, etc.).
- (e) The request for Link Up support be denied pending requested guidance from the FCC as to what constitutes "wireless facilities" for the purposes of the Link Up program.

### **Nevada**

In its Order dated July 21, 2011, the Public Utilities Commission of Nevada approved the Application of Nexus as an ETC to provide Lifeline and Link Up service throughout the non-rural service territories of Nevada Bell Telephone Company and Centurylink. In addition to the reporting requirements applicable to all ETC's Nexus application for designation was granted subject to the following conditions:



- (a) Nexus will provide the Regulatory Operations Staff's Consumer Complaint Resolution Division with a regulatory contact to who complaints should be addressed;
- (b) Nexus shall submit an advertising plan for the supported services it provides in the designated service area; and
- (c) Nexus shall also file with the Commission an advisory tariff providing information regarding all rates, terms and conditions, and proposed local calling areas.
- (d) Nexus will advertise at least once every three months the availability of each of the supported services as well as the rates and charges applicable to those services. Advertising shall be prominently presented in media of general distribution throughout the Company's designated service area;
- (e) Nexus will promote the availability of Lifeline and Link Up by ensuring that community health, welfare, and employment offices are provided with information about Lifeline and Link Up.

### **Maine**

In its Order dated August 25, 2011, the State of Maine Public Utilities Commission granted the request of Nexus to be designated as an Eligible Telecommunications Carrier for the limited purpose of providing Lifeline and Link service in the state of Maine. In its Order, the Commission also granted the following waiver of state requirements relating to ETC designation:

- (a) Section 3(C) of Chapter 206 of the Commission's Rules require that a petition for designation as an ETC contain "[a] substantive plan of investments to be made with initial federal support during the first five years in which support is received and a substantive description of how those expenditures will benefit customers." However, because the Company's petition did not include a request for high cost support, the requirement was deemed inapplicable to Nexus.
- (b) Section 3(E)(1) of the same Chapter of the Commission's Rules require Applicant's to include a map showing existing and planned locations of cell sites and shading to indicate where the carrier provides and plans to provide CMRS service signals. Because Nexus does not own or control any of its cell sites by which it proposes to provide service in Maine, and does not have access to maps of the cell sites of its underlying interconnected carrier, the Commission granted a waiver of this requirement.

**EXHIBIT 2**

BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Commission )  
Investigation of the Intrastate Universal ) Case No. 97-632-TP-COI  
Service Discounts. )

FINDING AND ORDER

The Commission finds:

- (1) Section 214(e)(1) of the Communications Act of 1934, as amended by the Telecommunications Act of 1996 (1996 Act), provides that a common carrier designated as an eligible telecommunications carrier (ETC) under this section or Section 214(e)(3) shall be eligible to receive universal service support in accordance with Section 254 of the 1996 Act.
- (2) Section 254(e) provides that, after the effective date of the Federal Communications Commission's (FCC) regulations implementing Section 254, only an ETC shall be eligible to receive specific universal service support.
- (3) On May 7, 1997, the FCC adopted rules to promote universal service consistent with its interpretation of the requirements of the 1996 Act.<sup>1</sup> In its CC 96-45 decision, the FCC, among other things, set forth parameters for the states to determine those carriers eligible to receive federal universal service support. The states were further directed to determine those carriers that should be classified as rural carriers or nonrural carriers for the purpose of federal universal service support consistent with the Communications Act of 1934 [47 U.S.C. §153(37)].
- (4) The Commission, in its November 20, 1997, Finding and Order in this proceeding, instructed applicant carriers to file as either rural or nonrural ETCs consistent with the requirements of the 1996 Act and the FCC. While the Commission allowed for the possibility of multiple ETC providers in nonrural areas, the Commission determined that it would limit rural ETCs to just the incumbent local exchange companies (ILECs) until rural carriers are required

<sup>1</sup> In the Matter of the Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Report and Order, rel. May 7, 1997.

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to migrate to a funding model similar to nonrural carriers, which is based on forward-looking economic costs.

- (5) On December 22, 2005, Nexus Communications, Inc. dba TSI (Nexus) filed a petition requesting designation as an ETC in specified exchanges within the nonrural service territories of Verizon North, Embarq, Cincinnati Bell, and AT&T Ohio for the purpose of receiving federal universal service support. Nexus is currently certified as a competitive local exchange carrier (CLEC), pursuant to Certificate of Public Convenience and Necessity No. 90-9164, in the local service areas of Verizon North, Embarq, Cincinnati Bell, and AT&T Ohio.

Nexus submits that it satisfies all of the statutory and regulatory requirements for designation as an ETC, including the offering of all of the supported services enumerated in Section 254. Nexus avers that its designation as an ETC will serve the public interest inasmuch as it will allow it to obtain federal universal service support, which it will utilize to offer innovative telecommunications services at competitive prices, thus, satisfying the 1996 Act's goal of promoting competition. Nexus represents that, upon designation as an ETC, it will participate in and offer Lifeline and Link-up programs to qualifying low-income customers and publicize the availability of these services in accordance with the FCC's rules. In conjunction with its application, Nexus filed a proposed tariff amendment incorporating Lifeline and Link-up services.

- (6) Upon a review of Nexus' request to be designated as an ETC in portions of the nonrural service areas of Verizon North, Embarq, Cincinnati Bell, and AT&T Ohio, the Commission finds that this request should be denied at this time. Section 214(e)(2) gives states the primary responsibility to designate ETCs and prescribes that all state ETC designations, whether rural or nonrural, must be consistent with the public interest, convenience and necessity.<sup>2</sup> In particular, the FCC has recognized that an ETC designation by a state commission can ultimately impact the amount of high cost and low-income monies distributed to an area served by a nonrural carrier.<sup>3</sup>

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<sup>2</sup> CC Docket No. 96-45, Report and Order, rel. March 17, 2005, at 20, 28.

<sup>3</sup> *Id.* at 27.

Upon reviewing the application filed by Nexus, the Commission notes that currently the residential monthly rate proposed by Nexus is between three to almost six times higher than the specific ILEC rate after the applicable Lifeline discount is subtracted. Additionally, the Commission notes that Nexus' tariffed connection fee is \$60.00. Although \$30.00 of this cost is subsidized by the Universal Service Fund, the Lifeline end user customer will still be responsible for the additional \$30.00. In comparison, as alternative regulation companies, Cincinnati Bell, AT&T Ohio, Embarq, and Verizon North all waive the end user portion of the connection fee.

The Commission finds that it is not in the public interest to utilize public funds for the purpose of subsidizing competition simply for the sake of being able to represent that there is another competitor in a particular exchange. This is especially the case in this situation in which Nexus' connection fee and proposed residential service and subsidized Lifeline rates will be significantly higher than the ILECs' corresponding rates. In support of its decision, the Commission recognizes the growing concern regarding the state of the federal universal service fund due to the rapid growth in federal support distributed to competitive ETCs.<sup>4</sup>

Additionally, the Commission recognizes that Ohio does not currently have an intrastate universal service fund to assist in the support of ETCs. The Commission does not seek to take any action at this time that may put further pressure on the federal fund and potentially result in the need for the creation of such an intrastate fund. Therefore, Nexus' application is denied inasmuch as, based on the record before us, we conclude that granting Nexus ETC status is not in the public interest.

In the event that circumstances change or the FCC resolves outstanding universal service issues in the future, the Commission may reevaluate its position in this matter at that time.

It is, therefore,


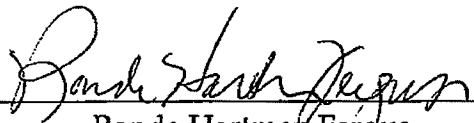


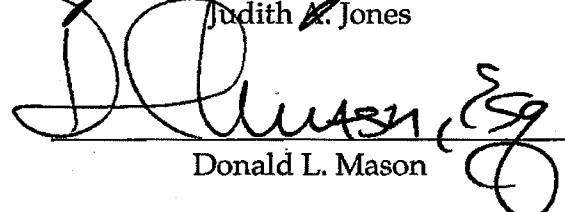
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<sup>4</sup> *Id.* at 25, 26; 19 FCC Rcd. 1563.

ORDERED, That Nexus' application is denied consistent with Finding (6). It is, further,

ORDERED, That a copy of this Finding and Order be served upon Nexus and all other interested parties and persons of record.

THE PUBLIC UTILITIES COMMISSION OF OHIO

  
Alan R. Schriber, Chairman  
Ronda Hartman Fergus  
Judith A. Jones  
Valerie A. Lemmie  
Donald L. Mason

JSA;geb

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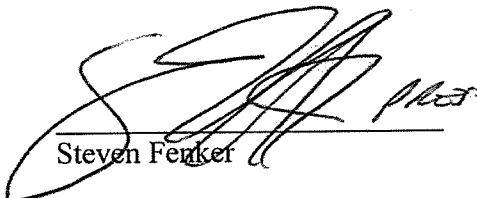
Renee J. Jenkins  
Secretary

### EXHIBIT 3

## CERTIFICATION

### COMMONWEALTH OF MASSACHUSETTS

I, Steven Fenker, President of Nexus Communications, Inc., state that the facts and allegations contained in the attached Responses to Interrogatories D.T.C. 1-5, D.T.C. 1-12, D.T.C. 1-14, D.T.C. 1-20, D.T.C. 1-26, and D.T.C. 1-27 are true to the best of my knowledge and belief.



Steven Fenker

Dated: Nov. 2, 2011



## EXHIBIT 4

Sheet1

OBJECTID,N,9,0	FID_1,N,Id	STA1	CENTER,C,10	CLLI,C,11	LAT,NPA	CITY_1,C,28
1	23	0	MA	ACTON	ACTNMAMADS1	128 978 ACTON
122	23	0	MA	ACTON	ACTNMAMADS1	128 978 ACTON
122	23	0	MA	ACTON	ACTNMAMADS1	128 978 ACTON
122	23	0	MA	ACTON	ACTNMAMADS1	128 978 ACTON
2	33	0	MA	ADAMS	ADMSMAMADS0	126 413 ADAMS
2	33	0	MA	ADAMS	ADMSMAMADS0	126 413 ADAMS
3	273	0	MA	AMESBURY	AMSBMAPLRS1	128 978 AMESBURY
3	273	0	MA	AMESBURY	AMSBMAPLRS1	128 978 AMESBURY
3	273	0	MA	AMESBURY	AMSBMAPLRS1	128 978 AMESBURY
4	277	0	MA	AMHERST	AMHRMAFEDS0	126 413 AMHERST
5	310	0	MA	ANDOVER	ANDVMAELDS0	128 978 ANDOVER
5	310	0	MA	ANDOVER	ANDVMAELDS0	128 978 ANDOVER
6	459	0	MA	ARLINGTON	ARTNMAPLDS0	128 781 ARLINGTON
6	459	0	MA	ARLINGTON	ARTNMAPLDS0	128 781 ARLINGTON
7	503	0	MA	ASHBURNHAM	ASHMMAPLRS1	128 978 ASHBURNHAM
7	503	0	MA	ASHBURNHAM	ASHMMAPLRS1	128 978 ASHBURNHAM
8	504	0	MA	ASHBY	ASHBMASODS0	128 978 ASHBY
9	512	0	MA	ASHFIELD	ASFDAMARS1	126 413 ASHFIELD
9	512	0	MA	ASHFIELD	ASFDAMARS1	126 413 ASHFIELD
10	552	0	MA	ASSONET	ASNTMAMADS0	128 508 ASSONET
11	575	0	MA	ATHOL	ATHOMARIDS1	128 978 ATHOL
11	575	0	MA	ATHOL	ATHOMARIDS1	128 978 ATHOL
11	575	0	MA	ATHOL	ATHOMARIDS1	128 978 ATHOL
11	575	0	MA	ATHOL	ATHOMARIDS1	128 978 ATHOL
11	575	0	MA	ATHOL	ATHOMARIDS1	128 978 ATHOL
12	608	0	MA	ATTLEBORO	ATLBMABADS0	128 508 ATTLEBORO
12	608	0	MA	ATTLEBORO	ATLBMABADS0	128 508 ATTLEBORO
12	608	0	MA	ATTLEBORO	ATLBMABADS0	128 508 ATTLEBORO
12	608	0	MA	ATTLEBORO	ATLBMABADS0	128 508 ATTLEBORO
13	628	0	MA	AUBURN	AUBNMALGDS0	128 508 AUBURN
14	700	0	MA	AYER	AYERMAPLDS0	128 978 AYER
14	700	0	MA	AYER	AYERMAPLDS0	128 978 AYER
15	810	0	MA	BARNSTABLE	BRNSMAMADS0	128 508 BARNSTABLE
15	810	0	MA	BARNSTABLE	BRNSMAMADS0	128 508 BARNSTABLE
15	810	0	MA	BARNSTABLE	BRNSMAMADS0	128 508 BARNSTABLE
16	816	0	MA	BARRE	BARRMAJARS1	128 978 BARRE
16	816	0	MA	BARRE	BARRMAJARS1	128 978 BARRE
17	951	0	MA	BECKET	BCKTMAWARS1	126 413 BECKET
17	951	0	MA	BECKET	BCKTMAWARS1	126 413 BECKET
17	951	0	MA	BECKET	BCKTMAWARS1	126 413 BECKET
17	951	0	MA	BECKET	BCKTMAWARS1	126 413 BECKET
17	951	0	MA	BECKET	BCKTMAWARS1	126 413 BECKET
17	951	0	MA	BECKET	BCKTMAWARS1	126 413 BECKET
17	951	0	MA	BECKET	BCKTMAWARS1	126 413 BECKET
17	951	0	MA	BECKET	BCKTMAWARS1	126 413 BECKET
18	979	0	MA	BELCHERTN	BLTWMAJADS0	126 413 BELCHERTOWN
18	979	0	MA	BELCHERTN	BLTWMAJADS0	126 413 BELCHERTOWN
19	1028	0	MA	BELLINGHAM	MLFRMAWADS0	128 508 MILFORD
20	1042	0	MA	BELMONT	BLMTMALEDS0	128 617 BELMONT
20	1042	0	MA	BELMONT	BLMTMALEDS0	128 617 BELMONT

Sheet1

21	1123	0	MA	BERLIN	BRLNMAHIRS1	128	978	BERLIN
22	1132	0	MA	BERNARDSTN	BRNRMACHRS1	126	413	BERNARDSTON
23	1183	0	MA	BEVERLY	BVRLMAELDS0	128	978	BEVERLY
23	1183	0	MA	BEVERLY	BVRLMAELDS0	128	978	BEVERLY
24	1226	0	MA	BILLERICA	BLRCMAANDS0	128	978	BILLERICA
25	1286	0	MA	BLACKSTONE	WNSCRICLDS1	128	508	BLACKSTONE
25	1286	0	MA	BLACKSTONE	WNSCRICLDS1	128	508	BLACKSTONE
26	1317	0	MA	BLANDFORD	BLNDMAGLRS1	126	413	BLANDFORD
27	1434	0	MA	BOLTON	BOTNMAMARS1	128	978	BOLTON
27	1434	0	MA	BOLTON	BOTNMAMARS1	128	978	BOLTON
27	1434	0	MA	BOLTON	BOTNMAMARS1	128	978	BOLTON
27	1434	0	MA	BOLTON	BOTNMAMARS1	128	978	BOLTON
28	1476	0	MA	BOSTON	BSTNMABODS2	128	617	BOSTON
28	1476	0	MA	BOSTON	BSTNMABODS2	128	617	BOSTON
28	1476	0	MA	BOSTON	BSTNMABODS2	128	617	BOSTON
29	1522	0	MA	BOYLSTON	BYTNMAMARS1	128	508	BOYLSTON
30	1559	0	MA	BRAINTREE	BRNTMAWADS0	128	781	BRAINTREE
30	1559	0	MA	BRAINTREE	BRNTMAWADS0	128	781	BRAINTREE
31	1618	0	MA	BREWSTER	BRWSMAYARS3	128	508	BREWSTER
32	1643	0	MA	BRIDGEWTR	BRWRMACHRS1	128	508	BRIDGEWATER
32	1643	0	MA	BRIDGEWTR	BRWRMACHRS1	128	508	BRIDGEWATER
32	1643	0	MA	BRIDGEWTR	BRWRMACHRS1	128	508	BRIDGEWATER
32	1643	0	MA	BRIDGEWTR	BRWRMACHRS1	128	508	BRIDGEWATER
32	1643	0	MA	BRIDGEWTR	BRWRMACHRS1	128	508	BRIDGEWATER
32	1643	0	MA	BRIDGEWTR	BRWRMACHRS1	128	508	BRIDGEWATER
32	1643	0	MA	BRIDGEWTR	BRWRMACHRS1	128	508	BRIDGEWATER
32	1643	0	MA	BRIDGEWTR	BRWRMACHRS1	128	508	BRIDGEWATER
33	1658	0	MA	BRIGHTON	BITNMAWIDS1	128	617	BRIGHTON
33	1658	0	MA	BRIGHTON	BITNMAWIDS1	128	617	BRIGHTON
34	1664	0	MA	BRIMFIELD	BMFDMAWADS0	126	413	BRIMFIELD
35	1698	0	MA	BROCKTON	BRTNMACRDS1	128	508	BROCKTON
35	1698	0	MA	BROCKTON	BRTNMACRDS1	128	508	BROCKTON
36	1727	0	MA	BROOKLINE	BKLIMAMADS1	128	617	BROOKLINE
36	1727	0	MA	BROOKLINE	BKLIMAMADS1	128	617	BROOKLINE
36	1727	0	MA	BROOKLINE	BKLIMAMADS1	128	617	BROOKLINE
37	1805	0	MA	BRYANTVL	BRYVMAUNDS0	128	781	HANSON
38	1891	0	MA	BURLINGTON	BURLMABEDS1	128	781	BURLINGTON
38	1891	0	MA	BURLINGTON	BURLMABEDS1	128	781	BURLINGTON
38	1891	0	MA	BURLINGTON	BURLMABEDS1	128	781	BURLINGTON
39	1952	0	MA	BUZZARDSBY	BZBYMAPERS1	128	508	BUZZARDS BAY
39	1952	0	MA	BUZZARDSBY	BZBYMAPERS1	128	508	BUZZARDS BAY
40	2054	0	MA	CAMBRIDGE	CMBRMAWADS2	128	617	CAMBRIDGE
40	2054	0	MA	CAMBRIDGE	CMBRMAWADS2	128	617	CAMBRIDGE
40	2054	0	MA	CAMBRIDGE	CMBRMAWADS2	128	617	CAMBRIDGE
41	2144	0	MA	CANTON	CNTNMAWADS0	128	781	CANTON
41	2144	0	MA	CANTON	CNTNMAWADS0	128	781	CANTON
42	2272	0	MA	CARVER	CRVRMAMARS1	128	508	CARVER
42	2272	0	MA	CARVER	CRVRMAMARS1	128	508	CARVER
42	2272	0	MA	CARVER	CRVRMAMARS1	128	508	CARVER
43	2320	0	MA	CATAUMET	CTMTMADERS1	128	508	NORTH FALMOUTH
43	2320	0	MA	CATAUMET	CTMTMADERS1	128	508	NORTH FALMOUTH

Sheet1

43	2320	0	MA	CATAUMET	CTMTMADERS1	128	508	NORTH FALMOUTH
44	2476	0	MA	CHARLEMONT	SPFDMAWOXTX	126	413	BUCKLAND
44	2476	0	MA	CHARLEMONT	SPFDMAWOXTX	126	413	BUCKLAND
44	2476	0	MA	CHARLEMONT	SPFDMAWOXTX	126	413	BUCKLAND
44	2476	0	MA	CHARLEMONT	SPFDMAWOXTX	126	413	BUCKLAND
45	2482	0	MA	CHARLESTN	BSTNMABODS9	128	617	CHARLESTOWN
45	2482	0	MA	CHARLESTN	BSTNMABODS9	128	617	CHARLESTOWN
46	2500	0	MA	CHARLTON	CATNMANMRS1	128	508	CHARLTON
46	2500	0	MA	CHARLTON	CATNMANMRS1	128	508	CHARLTON
47	2512	0	MA	CHATHAM	CHHMMAOHR1	128	508	CHATHAM
47	2512	0	MA	CHATHAM	CHHMMAOHR1	128	508	CHATHAM
48	2531	0	MA	CHELSEA	CHLSMACHDS0	128	617	CHELSEA
48	2531	0	MA	CHELSEA	CHLSMACHDS0	128	617	CHELSEA
49	2569	0	MA	CHESTERFLD	CHFDMASBRS1	126	413	CHESTERFIELD
49	2569	0	MA	CHESTERFLD	CHFDMASBRS1	126	413	CHESTERFIELD
49	2569	0	MA	CHESTERFLD	CHFDMASBRS1	126	413	CHESTERFIELD
51	2617	0	MA	CHICOPEE	CHCPMARIDS0	126	413	CHICOPEE
51	2617	0	MA	CHICOPEE	CHCPMARIDS0	126	413	CHICOPEE
52	2631	0	MA	CHILMARK	CHLMMASTR1	128	508	CHILMARK
53	2859	0	MA	CLINTON	CLTNMACHRS1	128	978	CLINTON
53	2859	0	MA	CLINTON	CLTNMACHRS1	128	978	CLINTON
54	2937	0	MA	COHASSET	HNHMMAGRDS0	128	781	COHASSET
54	2937	0	MA	COHASSET	HNHMMAGRDS0	128	781	COHASSET
54	2937	0	MA	COHASSET	HNHMMAGRDS0	128	781	COHASSET
55	3015	0	MA	COLRAIN	CLRNMAYARS1	126	413	COLRAIN
55	3015	0	MA	COLRAIN	CLRNMAYARS1	126	413	COLRAIN
56	3079	0	MA	CONCORD	CNCRMAWADS0	128	978	CONCORD
56	3079	0	MA	CONCORD	CNCRMAWADS0	128	978	CONCORD
56	3079	0	MA	CONCORD	CNCRMAWADS0	128	978	CONCORD
56	3079	0	MA	CONCORD	CNCRMAWADS0	128	978	CONCORD
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57	3117	0	MA	CONWAY	CNWMASHRS1	126	413	CONWAY
58	3428	0	MA	CUMMINGTON	CMTNMAMARS1	126	413	CUMMINGTON
58	3428	0	MA	CUMMINGTON	CMTNMAMARS1	126	413	CUMMINGTON
59	3494	0	MA	DALTON	DLTNMACARS1	126	413	DALTON
59	3494	0	MA	DALTON	DLTNMACARS1	126	413	DALTON
60	3526	0	MA	DANVERS	DNVSMAHIDS0	128	978	DANVERS
60	3526	0	MA	DANVERS	DNVSMAHIDS0	128	978	DANVERS
60	3526	0	MA	DANVERS	DNVSMAHIDS0	128	978	DANVERS
61	3645	0	MA	DEDHAM	DDHMMAWADS0	128	781	DEDHAM
61	3645	0	MA	DEDHAM	DDHMMAWADS0	128	781	DEDHAM
61	3645	0	MA	DEDHAM	DDHMMAWADS0	128	781	DEDHAM
62	3734	0	MA	DENNIS	BSRVMASTDS1	128	508	DENNIS
62	3734	0	MA	DENNIS	BSRVMASTDS1	128	508	DENNIS
63	3817	0	MA	DIGHTON	DGTNMAELDS0	128	508	DIGHTON
64	3888	0	MA	DORCHESTER	DRCHMAADDS1	128	617	DORCHESTER
64	3888	0	MA	DORCHESTER	DRCHMAADDS1	128	617	DORCHESTER
64	3888	0	MA	DORCHESTER	DRCHMAADDS1	128	617	DORCHESTER
65	3920	0	MA	DOVER	NDHMMAPIDS0	128	508	DOVER
65	3920	0	MA	DOVER	NDHMMAPIDS0	128	508	DOVER
66	4059	0	MA	DUXBURY	DXBRMACHRS1	128	781	DUXBURY

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66	4059	0 MA	DUXBURY	DXBRMACHRS1	128	781	DUXBURY
66	4059	0 MA	DUXBURY	DXBRMACHRS1	128	781	DUXBURY
67	4074	0 MA	E DOUGLAS	EDGLMAMARS1	128	508	EAST DOUGLAS
68	4123	0 MA	EASTBOSTON	EBSTMASADS1	128	617	EAST BOSTON
69	4126	0 MA	EASTHAMPTN	EHMPMARADS0	126	413	EASTHAMPTON
69	4126	0 MA	EASTHAMPTN	EHMPMARADS0	126	413	EASTHAMPTON
69	4126	0 MA	EASTHAMPTN	EHMPMARADS0	126	413	EASTHAMPTON
69	4126	0 MA	EASTHAMPTN	EHMPMARADS0	126	413	EASTHAMPTON
70	4134	0 MA	EASTON	ESTNMANMDS0	128	508	EASTON
71	4159	0 MA	EBRIDGEWTR	EBWRMABERS1	128	508	E BRIDGEWATER
71	4159	0 MA	EBRIDGEWTR	EBWRMABERS1	128	508	E BRIDGEWATER
72	4184	0 MA	EDGARTOWN	EDGRMAPPERS1	128	508	EDGARTOWN
72	4184	0 MA	EDGARTOWN	EDGRMAPPERS1	128	508	EDGARTOWN
72	4184	0 MA	EDGARTOWN	EDGRMAPPERS1	128	508	EDGARTOWN
72	4184	0 MA	EDGARTOWN	EDGRMAPPERS1	128	508	EDGARTOWN
72	4184	0 MA	EDGARTOWN	EDGRMAPPERS1	128	508	EDGARTOWN
72	4184	0 MA	EDGARTOWN	EDGRMAPPERS1	128	508	EDGARTOWN
73	4395	0 MA	ELONGMEADOW	ELNMMAPLDS0	126	413	E LONGMEADOW
74	4520	0 MA	ESSEX	ESSXMASPRS1	128	978	ESSEX
74	4520	0 MA	ESSEX	ESSXMASPRS1	128	978	ESSEX
74	4520	0 MA	ESSEX	ESSXMASPRS1	128	978	ESSEX
74	4520	0 MA	ESSEX	ESSXMASPRS1	128	978	ESSEX
74	4520	0 MA	ESSEX	ESSXMASPRS1	128	978	ESSEX
75	4582	0 MA	EVERETT	MLDNMAELDS2	128	617	EVERETT
75	4582	0 MA	EVERETT	MLDNMAELDS2	128	617	EVERETT
76	4680	0 MA	FALL RIVER	FLRVMANMDS1	128	508	FALL RIVER
76	4680	0 MA	FALL RIVER	FLRVMANMDS1	128	508	FALL RIVER
76	4680	0 MA	FALL RIVER	FLRVMANMDS1	128	508	FALL RIVER
76	4680	0 MA	FALL RIVER	FLRVMANMDS1	128	508	FALL RIVER
76	4680	0 MA	FALL RIVER	FLRVMANMDS1	128	508	FALL RIVER
76	4680	0 MA	FALL RIVER	FLRVMANMDS1	128	508	FALL RIVER
76	4680	0 MA	FALL RIVER	FLRVMANMDS1	128	508	FALL RIVER
76	4680	0 MA	FALL RIVER	FLRVMANMDS1	128	508	FALL RIVER
77	4692	0 MA	FALMOUTH	FLMOMAMGDS0	128	508	FALMOUTH
77	4692	0 MA	FALMOUTH	FLMOMAMGDS0	128	508	FALMOUTH
78	4819	0 MA	FITCHBURG	FTBGMAMADS1	128	978	FITCHBURG
79	5013	0 MA	FOXBORO	FXBOMACORS1	128	508	FOXBORO
79	5013	0 MA	FOXBORO	FXBOMACORS1	128	508	FOXBORO
80	5016	0 MA	FRAMINGHAM	FRMNMAUNDS8	128	508	FRAMINGHAM
80	5016	0 MA	FRAMINGHAM	FRMNMAUNDS8	128	508	FRAMINGHAM
80	5016	0 MA	FRAMINGHAM	FRMNMAUNDS8	128	508	FRAMINGHAM
81	5037	0 MA	FRANKLIN	FKLNMAMCDS0	128	508	FRANKLIN
82	5276	0 MA	GARDNER	GRNRMAWEDS0	128	978	GARDNER
82	5276	0 MA	GARDNER	GRNRMAWEDS0	128	978	GARDNER
82	5276	0 MA	GARDNER	GRNRMAWEDS0	128	978	GARDNER
82	5276	0 MA	GARDNER	GRNRMAWEDS0	128	978	GARDNER
83	5362	0 MA	GEORGETOWN	GRTWMAWIRS1	128	978	GEORGETOWN
83	5362	0 MA	GEORGETOWN	GRTWMAWIRS1	128	978	GEORGETOWN
84	5409	0 MA	GILBERTVL	GLVLMAHIDS0	126	413	GILBERTVILLE
84	5409	0 MA	GILBERTVL	GLVLMAHIDS0	126	413	GILBERTVILLE
85	5511	0 MA	GLOUCESTER	GLCSMAELDS0	128	978	GLOUCESTER
85	5511	0 MA	GLOUCESTER	GLCSMAELDS0	128	978	GLOUCESTER
86	5607	0 MA	GRAFTON	GFTNMAWORS1	128	508	GRAFTON

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86	5607	0	MA	GRAFTON	GFTNMAWORS1	128	508	GRAFTON
87	5623	0	MA	GRANBY	GRNBMAXADS0	126	413	GRANBY
88	5722	0	MA	GREATBNGTN	GRBRMASCDS0	126	413	GREAT BARRINGTON
88	5722	0	MA	GREATBNGTN	GRBRMASCDS0	126	413	GREAT BARRINGTON
88	5722	0	MA	GREATBNGTN	GRBRMASCDS0	126	413	GREAT BARRINGTON
89	5755	0	MA	GREENFIELD	GNFDMACHDS0	126	413	GREENFIELD
89	5755	0	MA	GREENFIELD	GNFDMACHDS0	126	413	GREENFIELD
89	5755	0	MA	GREENFIELD	GNFDMACHDS0	126	413	GREENFIELD
89	5755	0	MA	GREENFIELD	GNFDMACHDS0	126	413	GREENFIELD
90	5852	0	MA	GROTON	GRTNMAHODS0	128	978	GROTON
90	5852	0	MA	GROTON	GRTNMAHODS0	128	978	GROTON
91	5983	0	MA	HAMILTON	HMTNMAWIRS2	128	978	HAMILTON
92	6005	0	MA	HAMPDEN	HMPDMAMARS1	126	413	HAMPDEN
93	6025	0	MA	HANCOCK	HNCCMAXARL0	134	413	HANCOCK
93	6025	0	MA	HANCOCK	HNCCMAXARL0	134	413	HANCOCK
180	6025	0	MA	HANCOCK	HNCCMAXARL0	134	413	HANCOCK
180	6025	0	MA	HANCOCK	HNCCMAXARL0	134	413	HANCOCK
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180	6025	0	MA	HANCOCK	HNCCMAXARL0	134	413	HANCOCK
180	6025	0	MA	HANCOCK	HNCCMAXARL0	134	413	HANCOCK
94	6046	0	MA	HANOVER	HNVRMACODS0	128	781	HANOVER
95	6171	0	MA	HARVARD	HRVRMALIDS0	128	978	HARVARD
95	6171	0	MA	HARVARD	HRVRMALIDS0	128	978	HARVARD
129	6171	0	MA	HARVARD	HRVRMALIDS0	128	978	HARVARD
129	6171	0	MA	HARVARD	HRVRMALIDS0	128	978	HARVARD
96	6178	0	MA	HARWICH	HRWCMAMADS0	128	508	HARWICH
96	6178	0	MA	HARWICH	HRWCMAMADS0	128	508	HARWICH
97	6192	0	MA	HATFIELD	HTFDMACHRS1	126	413	HATFIELD
164	6192	0	MA	HATFIELD	HTFDMACHRS1	126	413	HATFIELD
164	6192	0	MA	HATFIELD	HTFDMACHRS1	126	413	HATFIELD
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164	6192	0	MA	HATFIELD	HTFDMACHRS1	126	413	HATFIELD
164	6192	0	MA	HATFIELD	HTFDMACHRS1	126	413	HATFIELD
98	6205	0	MA	HAVERHILL	HVHLMAWIDS1	128	978	HAVERHILL
98	6205	0	MA	HAVERHILL	HVHLMAWIDS1	128	978	HAVERHILL
99	6463	0	MA	HINGHAM	HNHMMAGRDS0	128	781	HINGHAM
99	6463	0	MA	HINGHAM	HNHMMAGRDS0	128	781	HINGHAM
99	6463	0	MA	HINGHAM	HNHMMAGRDS0	128	781	HINGHAM
100	6466	0	MA	HINSDALE	HNDLMASORS1	126	413	HINSDALE
100	6466	0	MA	HINSDALE	HNDLMASORS1	126	413	HINSDALE
100	6466	0	MA	HINSDALE	HNDLMASORS1	126	413	HINSDALE
100	6466	0	MA	HINSDALE	HNDLMASORS1	126	413	HINSDALE
101	6504	0	MA	HOLDEN	HLDNMAHORS1	128	508	HOLDEN
102	6532	0	MA	HOLLISTON	HLSTMACHRS5	128	508	HOLLISTON
102	6532	0	MA	HOLLISTON	HLSTMACHRS5	128	508	HOLLISTON
102	6532	0	MA	HOLLISTON	HLSTMACHRS5	128	508	HOLLISTON
103	6555	0	MA	HOLYOKE	HLYKMAMADS1	126	413	HOLYOKE
103	6555	0	MA	HOLYOKE	HLYKMAMADS1	126	413	HOLYOKE
103	6555	0	MA	HOLYOKE	HLYKMAMADS1	126	413	HOLYOKE
103	6555	0	MA	HOLYOKE	HLYKMAMADS1	126	413	HOLYOKE

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104	6615	0	MA	HOPKINTON	HPTNMAHRRS1	128	508	HOPKINTON
104	6615	0	MA	HOPKINTON	HPTNMAHRRS1	128	508	HOPKINTON
105	6653	0	MA	HOUSATONIC	HSTNMAMARS1	126	413	HOUSATONIC
105	6653	0	MA	HOUSATONIC	HSTNMAMARS1	126	413	HOUSATONIC
106	6686	0	MA	HUBBARDSTN	HBTNMAMARS1	128	978	HUBBARDSTON
107	6696	0	MA	HUDSON	HDSNMAFRDS0	128	978	HUDSON
108	6716	0	MA	HULL	HNHMMAGRDS0	128	781	HULL
108	6716	0	MA	HULL	HNHMMAGRDS0	128	781	HULL
108	6716	0	MA	HULL	HNHMMAGRDS0	128	781	HULL
50	6746	0	MA	HUNTINGTON	HNTNMAMARS1	126	413	HUNTINGTON
109	6746	0	MA	HUNTINGTON	HNTNMAMARS1	126	413	HUNTINGTON
109	6746	0	MA	HUNTINGTON	HNTNMAMARS1	126	413	HUNTINGTON
109	6746	0	MA	HUNTINGTON	HNTNMAMARS1	126	413	HUNTINGTON
110	6786	0	MA	HYANNIS	HYNSMAOCDS1	128	508	HYANNIS
110	6786	0	MA	HYANNIS	HYNSMAOCDS1	128	508	HYANNIS
111	6789	0	MA	HYDE PARK	HYPKMAHADS0	128	617	HYDE PARK
112	6891	0	MA	IPSWICH	IPSWMACORS1	128	978	IPSWICH
112	6891	0	MA	IPSWICH	IPSWMACORS1	128	978	IPSWICH
112	6891	0	MA	IPSWICH	IPSWMACORS1	128	978	IPSWICH
112	6891	0	MA	IPSWICH	IPSWMACORS1	128	978	IPSWICH
112	6891	0	MA	IPSWICH	IPSWMACORS1	128	978	IPSWICH
112	6891	0	MA	IPSWICH	IPSWMACORS1	128	978	IPSWICH
112	6891	0	MA	IPSWICH	IPSWMACORS1	128	978	IPSWICH
112	6891	0	MA	IPSWICH	IPSWMACORS1	128	978	IPSWICH
113	6989	0	MA	JAMAICA PL	WRXBMABEDS0	128	617	JAMAICA PLAIN
113	6989	0	MA	JAMAICA PL	WRXBMABEDS0	128	617	JAMAICA PLAIN
114	7364	0	MA	KINGSTON	KGTNMASLDS0	128	781	KINGSTON
115	7740	0	MA	LAWRENCE	LWRNMACADS2	128	978	LAWRENCE
115	7740	0	MA	LAWRENCE	LWRNMACADS2	128	978	LAWRENCE
115	7740	0	MA	LAWRENCE	LWRNMACADS2	128	978	LAWRENCE
115	7740	0	MA	LAWRENCE	LWRNMACADS2	128	978	LAWRENCE
116	7810	0	MA	LEE	LEE MAHIDS0	126	413	LEE
116	7810	0	MA	LEE	LEE MAHIDS0	126	413	LEE
116	7810	0	MA	LEE	LEE MAHIDS0	126	413	LEE
116	7810	0	MA	LEE	LEE MAHIDS0	126	413	LEE
116	7810	0	MA	LEE	LEE MAHIDS0	126	413	LEE
116	7810	0	MA	LEE	LEE MAHIDS0	126	413	LEE
117	7832	0	MA	LEICESTER	LCSRMAGRRS1	128	508	LEICESTER
118	7862	0	MA	LENOX	LENXMAWADS0	126	413	LENOX
118	7862	0	MA	LENOX	LENXMAWADS0	126	413	LENOX
118	7862	0	MA	LENOX	LENXMAWADS0	126	413	LENOX
119	7869	0	MA	LEOMINSTER	LMNSMASCDS1	128	978	LEOMINSTER
119	7869	0	MA	LEOMINSTER	LMNSMASCDS1	128	978	LEOMINSTER
119	7869	0	MA	LEOMINSTER	LMNSMASCDS1	128	978	LEOMINSTER
120	7938	0	MA	LEXINGTON	LXTNMAWADS0	128	781	LEXINGTON
120	7938	0	MA	LEXINGTON	LXTNMAWADS0	128	781	LEXINGTON
121	8000	0	MA	LINCOLN	LXTNMAWADS0	128	781	LINCOLN
121	8000	0	MA	LINCOLN	LXTNMAWADS0	128	781	LINCOLN
121	8000	0	MA	LINCOLN	LXTNMAWADS0	128	781	LINCOLN
123	8211	0	MA	LONGMEADOW	LGMDMALODS0	126	413	LONGMEADOW
124	8293	0	MA	LOWELL	DRCTMAMMDS0	128	978	LOWELL
124	8293	0	MA	LOWELL	DRCTMAMMDS0	128	978	LOWELL

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124	8293	0	MA	LOWELL	DRCTMAMMDS0	128	978	LOWELL
125	8347	0	MA	LUDLOW	LDLWMAWIRS1	126	413	LUDLOW
125	8347	0	MA	LUDLOW	LDLWMAWIRS1	126	413	LUDLOW
126	8365	0	MA	LUNENBURG	LNBMASCDSD0	128	978	LUNENBURG
127	8408	0	MA	LYNNFIELD	LYFDMACARS1	128	781	LYNNFIELD
128	8410	0	MA	LYNN	LYNNMACHDS1	128	781	LYNN
128	8410	0	MA	LYNN	LYNNMACHDS1	128	781	LYNN
130	8516	0	MA	MALDEN	MLDNMAELDS2	128	781	MALDEN
130	8516	0	MA	MALDEN	MLDNMAELDS2	128	781	MALDEN
130	8516	0	MA	MALDEN	MLDNMAELDS2	128	781	MALDEN
131	8547	0	MA	MANCHESTER	MNCHMASURS3	128	978	MANCHESTER
132	8592	0	MA	MANSFIELD	MNFDMABRDS0	128	508	MANSFIELD
132	8592	0	MA	MANSFIELD	MNFDMABRDS0	128	508	MANSFIELD
133	8633	0	MA	MARBLEHEAD	MRBLMAPLDS0	128	781	MARBLEHEAD
134	8674	0	MA	MARION	MARNMAMIRS1	128	508	MARION
135	8700	0	MA	MARLBORO	MRBOMAMADS0	128	508	MARLBORO
136	8734	0	MA	MARSHFIELD	MRFDMAMADS0	128	781	MARSHFIELD
136	8734	0	MA	MARSHFIELD	MRFDMAMADS0	128	781	MARSHFIELD
136	8734	0	MA	MARSHFIELD	MRFDMAMADS0	128	781	MARSHFIELD
136	8734	0	MA	MARSHFIELD	MRFDMAMADS0	128	781	MARSHFIELD
137	8802	0	MA	MATTAPOSTT	MTPSMAMHRS1	128	508	MATTAPOISETT
138	8840	0	MA	MAYNARD	MYNRMAWARS1	128	978	MAYNARD
138	8840	0	MA	MAYNARD	MYNRMAWARS1	128	978	MAYNARD
139	8978	0	MA	MEDFIELD	MEFDMAPLDS0	128	508	MEDFIELD
140	8979	0	MA	MEDFORD	MLDNMAELDS2	128	781	MEDFORD
140	8979	0	MA	MEDFORD	MLDNMAELDS2	128	781	MEDFORD
141	8998	0	MA	MEDWAY	MEWYMAVIRS2	128	508	MEDWAY
141	8998	0	MA	MEDWAY	MEWYMAVIRS2	128	508	MEDWAY
141	8998	0	MA	MEDWAY	MEWYMAVIRS2	128	508	MEDWAY
142	9014	0	MA	MELROSE	MLDNMAELDS2	128	781	MELROSE
142	9014	0	MA	MELROSE	MLDNMAELDS2	128	781	MELROSE
143	9085	0	MA	MERRIMAC	MRMCMACERS1	128	978	MERRIMAC
143	9085	0	MA	MERRIMAC	MRMCMACERS1	128	978	MERRIMAC
144	9127	0	MA	MIDDLEBORO	MDLBMAJADS0	128	508	MIDDLEBORO
145	9200	0	MA	MILFORD	MLFRMAWADS0	128	508	MILFORD
146	9215	0	MA	MILLBURY	MLBRMAGRRS1	128	508	MILLBURY
146	9215	0	MA	MILLBURY	MLBRMAGRRS1	128	508	MILLBURY
147	9227	0	MA	MILLERSFELS	MLFLMACRRS1	126	413	MILLERS FALLS
147	9227	0	MA	MILLERSFELS	MLFLMACRRS1	126	413	MILLERS FALLS
148	9243	0	MA	MILLIS	MLISMAMARS3	128	508	MILLIS
148	9243	0	MA	MILLIS	MLISMAMARS3	128	508	MILLIS
149	9272	0	MA	MILTON	MLTNMAADDS0	128	617	MILTON
150	9387	0	MA	MONROE BDG	RDBOVTTU424	126	413	ROWE
151	9412	0	MA	MONSON	MNSNMAMADS0	126	413	MONSON
152	9415	0	MA	MONTAGUE	MTAGMACERS1	126	413	MONTAGUE
153	9812	0	MA	NANTUCKET	NCKTMAUNDS0	128	508	NANTUCKET
153	9812	0	MA	NANTUCKET	NCKTMAUNDS0	128	508	NANTUCKET
154	9859	0	MA	NATICK	NTCKMAECDS1	128	508	NATICK
155	9884	0	MA	NEEDHAM	NDHMMAPIDS0	128	781	NEEDHAM
155	9884	0	MA	NEEDHAM	NDHMMAPIDS0	128	781	NEEDHAM
156	10024	0	MA	NEWBEDFORD	NBFRMAAEDS1	128	508	NEW BEDFORD



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156	10024	0	MA	NEWBEDFORD	NBFRMAAEDS1	128	508	NEW BEDFORD
156	10024	0	MA	NEWBEDFORD	NBFRMAAEDS1	128	508	NEW BEDFORD
156	10024	0	MA	NEWBEDFORD	NBFRMAAEDS1	128	508	NEW BEDFORD
156	10024	0	MA	NEWBEDFORD	NBFRMAAEDS1	128	508	NEW BEDFORD
156	10024	0	MA	NEWBEDFORD	NBFRMAAEDS1	128	508	NEW BEDFORD
156	10024	0	MA	NEWBEDFORD	NBFRMAAEDS1	128	508	NEW BEDFORD
156	10024	0	MA	NEWBEDFORD	NBFRMAAEDS1	128	508	NEW BEDFORD
156	10024	0	MA	NEWBEDFORD	NBFRMAAEDS1	128	508	NEW BEDFORD
157	10050	0	MA	NEWBURYPT	NBPTMAGRDS1	128	978	NEWBURYPORT
158	10142	0	MA	NEWTON	NWTNMAWADS0	128	617	NEWTON
158	10142	0	MA	NEWTON	NWTNMAWADS0	128	617	NEWTON
158	10142	0	MA	NEWTON	NWTNMAWADS0	128	617	NEWTON
158	10142	0	MA	NEWTON	NWTNMAWADS0	128	617	NEWTON
159	10206	0	MA	NO ATTLEBO	NATLMAOEDS1	128	508	NO ATTLEBORO
159	10206	0	MA	NO ATTLEBO	NATLMAOEDS1	128	508	NO ATTLEBORO
160	10235	0	MA	NO READING	NRDGMACERS1	128	978	N READING
160	10235	0	MA	NO READING	NRDGMACERS1	128	978	N READING
162	10247	0	MA	NOBROOKFLD	NBFDMASMRS1	128	508	NORTH BROOKFIELD
162	10247	0	MA	NOBROOKFLD	NBFDMASMRS1	128	508	NORTH BROOKFIELD
162	10247	0	MA	NOBROOKFLD	NBFDMASMRS1	128	508	NORTH BROOKFIELD
162	10247	0	MA	NOBROOKFLD	NBFDMASMRS1	128	508	NORTH BROOKFIELD
163	10299	0	MA	NORTHADAMS	NADMMASUDS0	126	413	NORTH ADAMS
163	10299	0	MA	NORTHADAMS	NADMMASUDS0	126	413	NORTH ADAMS
165	10306	0	MA	NORTHBORO	NRBOMASCRS1	128	508	NORTHBORO
165	10306	0	MA	NORTHBORO	NRBOMASCRS1	128	508	NORTHBORO
166	10310	0	MA	NORTHFIELD	NRFDMMARS1	126	413	NORTHFIELD
166	10310	0	MA	NORTHFIELD	NRFDMMARS1	126	413	NORTHFIELD
167	10331	0	MA	NORTON	NRTNMATARS1	128	508	NORTON
168	10346	0	MA	NORWELL	NRWLMAMARS1	128	781	NORWELL
169	10353	0	MA	NORWOOD	NRWDMAVEDS0	128	781	NORWOOD
169	10353	0	MA	NORWOOD	NRWDMAVEDS0	128	781	NORWOOD
170	10444	0	MA	OAKHAM	OKHMMARURS1	128	508	OAKHAM
171	10650	0	MA	ORANGE	ORNGMASMDS0	128	978	ORANGE
171	10650	0	MA	ORANGE	ORNGMASMDS0	128	978	ORANGE
171	10650	0	MA	ORANGE	ORNGMASMDS0	128	978	ORANGE
171	10650	0	MA	ORANGE	ORNGMASMDS0	128	978	ORANGE
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172	10688	0	MA	ORLEANS	ORLNMAYADS0	128	508	ORLEANS
172	10688	0	MA	ORLEANS	ORLNMAYADS0	128	508	ORLEANS
172	10688	0	MA	ORLEANS	ORLNMAYADS0	128	508	ORLEANS
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172	10688	0	MA	ORLEANS	ORLNMAYADS0	128	508	ORLEANS
173	10739	0	MA	OSTERVILLE	MSHPMAGNDS0	128	508	MASHPEE
173	10739	0	MA	OSTERVILLE	MSHPMAGNDS0	128	508	MASHPEE
173	10739	0	MA	OSTERVILLE	MSHPMAGNDS0	128	508	MASHPEE
173	10739	0	MA	OSTERVILLE	MSHPMAGNDS0	128	508	MASHPEE
173	10739	0	MA	OSTERVILLE	MSHPMAGNDS0	128	508	MASHPEE
173	10739	0	MA	OSTERVILLE	MSHPMAGNDS0	128	508	MASHPEE
173	10739	0	MA	OSTERVILLE	MSHPMAGNDS0	128	508	MASHPEE
173	10739	0	MA	OSTERVILLE	MSHPMAGNDS0	128	508	MASHPEE

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173	10739	0 MA	OSTERVILLE	MSHPMAGNDSO	128	508	MASHEE
174	10751	0 MA	OTIS	OTISMAEORS1	126	413	OTIS
174	10751	0 MA	OTIS	OTISMAEORS1	126	413	OTIS
174	10751	0 MA	OTIS	OTISMAEORS1	126	413	OTIS
175	10797	0 MA	OXFORD	OXFRMAWHRS1	128	508	OXFORD
175	10797	0 MA	OXFORD	OXFRMAWHRS1	128	508	OXFORD
176	10859	0 MA	PALMER	PLMRMAPLDS0	126	413	PALMER
212	11006	0 RI	PAWTUCKET	PWTCRIHIDS1	130	401	PAWTUCKET
177	11020	0 MA	PEABODY	PBDYMACEDS0	128	978	PEABODY
177	11020	0 MA	PEABODY	PBDYMACEDS0	128	978	PEABODY
178	11101	0 MA	PEPPERELL	PPRLMAHIRS1	128	978	PEPPERELL
178	11101	0 MA	PEPPERELL	PPRLMAHIRS1	128	978	PEPPERELL
179	11151	0 MA	PETERSHAM	PTRSMAEARS1	128	978	PETERSHAM
179	11151	0 MA	PETERSHAM	PTRSMAEARS1	128	978	PETERSHAM
179	11151	0 MA	PETERSHAM	PTRSMAEARS1	128	978	PETERSHAM
179	11151	0 MA	PETERSHAM	PTRSMAEARS1	128	978	PETERSHAM
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179	11151	0 MA	PETERSHAM	PTRSMAEARS1	128	978	PETERSHAM
179	11151	0 MA	PETERSHAM	PTRSMAEARS1	128	978	PETERSHAM
179	11151	0 MA	PETERSHAM	PTRSMAEARS1	128	978	PETERSHAM
179	11151	0 MA	PETERSHAM	PTRSMAEARS1	128	978	PETERSHAM
181	11431	0 MA	PLYMOUTH	PLMOMACODS0	128	508	PLYMOUTH
181	11431	0 MA	PLYMOUTH	PLMOMACODS0	128	508	PLYMOUTH
181	11431	0 MA	PLYMOUTH	PLMOMACODS0	128	508	PLYMOUTH
181	11431	0 MA	PLYMOUTH	PLMOMACODS0	128	508	PLYMOUTH
181	11431	0 MA	PLYMOUTH	PLMOMACODS0	128	508	PLYMOUTH
181	11431	0 MA	PLYMOUTH	PLMOMACODS0	128	508	PLYMOUTH
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181	11431	0 MA	PLYMOUTH	PLMOMACODS0	128	508	PLYMOUTH
181	11431	0 MA	PLYMOUTH	PLMOMACODS0	128	508	PLYMOUTH
181	11431	0 MA	PLYMOUTH	PLMOMACODS0	128	508	PLYMOUTH
181	11431	0 MA	PLYMOUTH	PLMOMACODS0	128	508	PLYMOUTH
181	11431	0 MA	PLYMOUTH	PLMOMACODS0	128	508	PLYMOUTH
182	11652	0 MA	PRINCETON	PRTNMABORS1	128	978	PRINCETON
244	11686	0 MA	PROVINCETN	PRVNMAWIRS2	128	508	PROVINCETOWN
244	11686	0 MA	PROVINCETN	PRVNMAWIRS2	128	508	PROVINCETOWN
244	11686	0 MA	PROVINCETN	PRVNMAWIRS2	128	508	PROVINCETOWN
244	11686	0 MA	PROVINCETN	PRVNMAWIRS2	128	508	PROVINCETOWN
244	11686	0 MA	PROVINCETN	PRVNMAWIRS2	128	508	PROVINCETOWN
244	11686	0 MA	PROVINCETN	PRVNMAWIRS2	128	508	PROVINCETOWN
184	11785	0 MA	QUINCY	QNCYMAHADSD1	128	617	QUINCY
184	11785	0 MA	QUINCY	QNCYMAHADSD1	128	617	QUINCY
184	11785	0 MA	QUINCY	QNCYMAHADSD1	128	617	QUINCY
184	11785	0 MA	QUINCY	QNCYMAHADSD1	128	617	QUINCY
185	11839	0 MA	RANDOLPH	RNDHMAMEDSO	128	781	RANDOLPH
186	11903	0 MA	READING	RDNGMALIDS0	128	781	READING
187	11971	0 MA	REHOBOOTH	RHBTMABADS0	128	508	REHOBOOTH
188	12008	0 MA	REVERE	REVRMABEDSO	128	781	REVERE
189	12068	0 MA	RICHMOND	RCMDMAXADSO	126	413	RICHMOND
189	12068	0 MA	RICHMOND	RCMDMAXADSO	126	413	RICHMOND

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189	12068	0 MA	RICHMOND	RCMDMAXADS0	126	413	RICHMOND
190	12213	0 MA	ROCHESTER	ROCHMANODS0	128	508	ROCHESTER
191	12247	0 MA	ROCKLAND	RKLDMAWEDS0	128	781	ROCKLAND
192	12254	0 MA	ROCKPORT	RCPTMAMARS1	128	978	ROCKPORT
193	12389	0 MA	ROWLEY	RWLYMAHARS1	128	978	ROWLEY
193	12389	0 MA	ROWLEY	RWLYMAHARS1	128	978	ROWLEY
193	12389	0 MA	ROWLEY	RWLYMAHARS1	128	978	ROWLEY
194	12392	0 MA	ROXBURY	RXBRMAWADS1	128	617	ROXBURY
194	12392	0 MA	ROXBURY	RXBRMAWADS1	128	617	ROXBURY
195	12460	0 MA	RUSSELL	RSSLMAMARS1	126	413	RUSSELL
196	12479	0 MA	RUTLAND	RTLDMAMARS1	128	508	RUTLAND
197	12509	0 MA	SAGAMORE	SGMRMAYADS0	128	508	SAGAMORE BEACH
197	12509	0 MA	SAGAMORE	SGMRMAYADS0	128	508	SAGAMORE BEACH
197	12509	0 MA	SAGAMORE	SGMRMAYADS0	128	508	SAGAMORE BEACH
197	12509	0 MA	SAGAMORE	SGMRMAYADS0	128	508	SAGAMORE BEACH
198	12520	0 MA	SALEM	SALMMANODS0	128	978	SALEM
198	12520	0 MA	SALEM	SALMMANODS0	128	978	SALEM
199	12604	0 MA	SANDISFLD	SNDSMAOTRS1	126	413	SANDISFIELD
199	12604	0 MA	SANDISFLD	SNDSMAOTRS1	126	413	SANDISFIELD
200	12677	0 MA	SAUGUS	SAGSMACEDS0	128	781	SAUGUS
200	12677	0 MA	SAUGUS	SAGSMACEDS0	128	781	SAUGUS
201	12733	0 MA	SCITUATE	SCTTMAFPRS1	128	781	SCITUATE
202	12809	0 MA	SEEKONK	EPRVRINB336	128	508	SEEKONK
203	12885	0 MA	SHARON	SHRNMAHIRS1	128	781	SHARON
203	12885	0 MA	SHARON	SHRNMAHIRS1	128	781	SHARON
204	12915	0 MA	SHEFFIELD	SHFDMAMARS1	126	413	SHEFFIELD
205	12918	0 MA	SHELBUNFLS	SLFLMACRRS1	126	413	SHELBURNE FALLS
205	12918	0 MA	SHELBUNFLS	SLFLMACRRS1	126	413	SHELBURNE FALLS
205	12918	0 MA	SHELBUNFLS	SLFLMACRRS1	126	413	SHELBURNE FALLS
206	12996	0 MA	SHIRLEY	SHRYMACHDS0	128	978	SHIRLEY
206	12996	0 MA	SHIRLEY	SHRYMACHDS0	128	978	SHIRLEY
207	13012	0 MA	SHREWSBURY	SHRWMAGRDS1	128	508	SHREWSBURY
207	13012	0 MA	SHREWSBURY	SHRWMAGRDS1	128	508	SHREWSBURY
207	13012	0 MA	SHREWSBURY	SHRWMAGRDS1	128	508	SHREWSBURY
208	13193	0 MA	SO BOSTON	SBTNMAEFDS0	128	617	S BOSTON
209	13199	0 MA	SO DEERFLD	SDFDMACODS0	126	413	SOUTH DEERFIELD
209	13199	0 MA	SO DEERFLD	SDFDMACODS0	126	413	SOUTH DEERFIELD
210	13252	0 MA	SOMERVILLE	SOVLMACEDS0	128	617	SOMERVILLE
210	13252	0 MA	SOMERVILLE	SOVLMACEDS0	128	617	SOMERVILLE
211	13284	0 MA	SOUTHBGD	SDGGMAMARS1	128	508	SOUTHBRIDGE
211	13284	0 MA	SOUTHBGD	SDGGMAMARS1	128	508	SOUTHBRIDGE
211	13284	0 MA	SOUTHBGD	SDGGMAMARS1	128	508	SOUTHBRIDGE
213	13307	0 MA	SOUTHWICK	SWCKMACODS0	126	413	SOUTHWICK
213	13307	0 MA	SOUTHWICK	SWCKMACODS0	126	413	SOUTHWICK
214	13335	0 MA	SPENCER	SPNCMAMERS1	128	508	SPENCER
215	13388	0 MA	SPRINGFLD	AGWMMARODS0	126	413	SPRINGFIELD
216	13608	0 MA	STERLING	STNGMABRRS1	128	978	STERLING
217	13648	0 MA	STOCKBDG	STBRMAPIRS1	126	413	WEST STOCKBRIDGE
218	13665	0 MA	STONEHAM	WKFDMABEDS0	128	781	STONEHAM
218	13665	0 MA	STONEHAM	WKFDMABEDS0	128	781	STONEHAM
219	13680	0 MA	STOUGHTON	SGTNMAWADS0	128	781	STOUGHTON

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219	13680	0 MA	STOUGHTON	SGTNMAWADS0	128	781	STOUGHTON
220	13730	0 MA	STURBRIDGE	STBGMAMARS1	128	508	STURBRIDGE
220	13730	0 MA	STURBRIDGE	STBGMAMARS1	128	508	STURBRIDGE
221	13745	0 MA	SUDBURY	SDBRMABPDS0	128	978	SUDBURY
222	13942	0 MA	TAUNTON	TNTNMAPLDS1	128	508	TAUNTON
223	13978	0 MA	TEMPLETON	TMTNMAMERS1	128	978	TEMPLETON
223	13978	0 MA	TEMPLETON	TMTNMAMERS1	128	978	TEMPLETON
224	14161	0 MA	TOPSFIELD	TPFDMACERS1	128	978	TOPSFIELD
224	14161	0 MA	TOPSFIELD	TPFDMACERS1	128	978	TOPSFIELD
224	14161	0 MA	TOPSFIELD	TPFDMACERS1	128	978	TOPSFIELD
224	14161	0 MA	TOPSFIELD	TPFDMACERS1	128	978	TOPSFIELD
225	14180	0 MA	TOWNSEND	TWNSMARADS0	128	978	TOWNSEND
226	14314	0 MA	TURNERSFLS	TRFLMAAARS1	126	413	TURNERS FALLS
227	14359	0 MA	TYNGSBORO	TYNGMAKEDS0	128	978	TYNGSBORO
227	14359	0 MA	TYNGSBORO	TYNGMAKEDS0	128	978	TYNGSBORO
228	14435	0 MA	UPTON	UPTNMAPIRS1	128	508	UPTON
229	14455	0 MA	UXBRIDGE	UXBRMACORS1	128	508	UXBRIDGE
229	14455	0 MA	UXBRIDGE	UXBRMACORS1	128	508	UXBRIDGE
230	14610	0 MA	VINEYRDHVN	VYHVMAEDDS0	128	508	VINEYARD HAVEN
230	14610	0 MA	VINEYRDHVN	VYHVMAEDDS0	128	508	VINEYARD HAVEN
230	14610	0 MA	VINEYRDHVN	VYHVMAEDDS0	128	508	VINEYARD HAVEN
231	14654	0 MA	W BOYLSTON	WBTNMAPRDS0	128	508	BOYLSTON
232	14674	0 MA	W NEWBURY	WNWBMAMARS1	128	978	WEST NEWBURY
233	14676	0 MA	W STOCKBDG	WSBGMALERS1	126	413	WEST STOCKBRIDGE
234	14711	0 MA	WAKEFIELD	WKFDMABEDS0	128	781	WAKEFIELD
234	14711	0 MA	WAKEFIELD	WKFDMABEDS0	128	781	WAKEFIELD
235	14780	0 MA	WALPOLE	WLPLMASSDS0	128	508	WALPOLE
235	14780	0 MA	WALPOLE	WLPLMASSDS0	128	508	WALPOLE
236	14785	0 MA	WALTHAM	WLHMMASPD1	128	781	WALTHAM
236	14785	0 MA	WALTHAM	WLHMMASPD1	128	781	WALTHAM
236	14785	0 MA	WALTHAM	WLHMMASPD1	128	781	WALTHAM
237	14816	0 MA	WAREHAM	WAHMMAHIDS0	128	508	WAREHAM
237	14816	0 MA	WAREHAM	WAHMMAHIDS0	128	508	WAREHAM
238	14817	0 MA	WARE	WAREMABADS0	126	413	WARE
238	14817	0 MA	WARE	WAREMABADS0	126	413	WARE
238	14817	0 MA	WARE	WAREMABADS0	126	413	WARE
239	14831	0 MA	WARREN	WRRNMAQUDS0	126	413	WEST BROOKFIELD
161	14838	0 RI	WARREN	WRRNRIEVDS0	130	401	WARREN
240	14927	0 MA	WATERTOWN	WTTWMAWCDS2	128	617	WATERTOWN
240	14927	0 MA	WATERTOWN	WTTWMAWCDS2	128	617	WATERTOWN
241	14993	0 MA	WAYLAND	WYLDMABPRS6	128	508	WAYLAND
242	15036	0 MA	WEBSTER	WBSTMANEDS0	128	508	WEBSTER
243	15071	0 MA	WELLESLEY	WLSLMALADS1	128	781	WELLESLEY
243	15071	0 MA	WELLESLEY	WLSLMALADS1	128	781	WELLESLEY
183	15072	0 MA	WELLFLEET	WLLFMAMARS1	128	508	WELLFLEET
183	15072	0 MA	WELLFLEET	WLLFMAMARS1	128	508	WELLFLEET
183	15072	0 MA	WELLFLEET	WLLFMAMARS1	128	508	WELLFLEET
183	15072	0 MA	WELLFLEET	WLLFMAMARS1	128	508	WELLFLEET
183	15072	0 MA	WELLFLEET	WLLFMAMARS1	128	508	WELLFLEET
245	15138	0 MA	WESTBORO	WSBOMASUDS1	128	508	WESTBORO
245	15138	0 MA	WESTBORO	WSBOMASUDS1	128	508	WESTBORO

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246	15158	0	MA	WESTFIELD	WSFDMAWADS0	126	413	WESTFIELD
246	15158	0	MA	WESTFIELD	WSFDMAWADS0	126	413	WESTFIELD
247	15165	0	MA	WESTFORD	WSFRMAEDS1	128	978	WESTFORD
247	15165	0	MA	WESTFORD	WSFRMAEDS1	128	978	WESTFORD
247	15165	0	MA	WESTFORD	WSFRMAEDS1	128	978	WESTFORD
248	15171	0	MA	WESTMINSTR	WMNSMAELRS1	128	978	WESTMINSTER
248	15171	0	MA	WESTMINSTR	WMNSMAELRS1	128	978	WESTMINSTER
248	15171	0	MA	WESTMINSTR	WMNSMAELRS1	128	978	WESTMINSTER
249	15194	0	MA	WESTPORT	WSPTMADRDS0	128	508	WESTPORT
249	15194	0	MA	WESTPORT	WSPTMADRDS0	128	508	WESTPORT
249	15194	0	MA	WESTPORT	WSPTMADRDS0	128	508	WESTPORT
250	15218	0	MA	WEYMOUTH	WYMOMAMIDS0	128	781	WEYMOUTH
250	15218	0	MA	WEYMOUTH	WYMOMAMIDS0	128	781	WEYMOUTH
250	15218	0	MA	WEYMOUTH	WYMOMAMIDS0	128	781	WEYMOUTH
251	15310	0	MA	WHITINSVL	WHVLMAPARS1	128	508	WHITINSVILLE
252	15311	0	MA	WHITMAN	WHMNMAMARS1	128	781	WHITMAN
253	15339	0	MA	WILBRAHAM	WLBRMAMARS1	126	413	WILBRAHAM
253	15339	0	MA	WILBRAHAM	WLBRMAMARS1	126	413	WILBRAHAM
254	15362	0	MA	WILLIAMSBG	WLBGMAMARS1	126	413	WILLIAMSBURG
254	15362	0	MA	WILLIAMSBG	WLBGMAMARS1	126	413	WILLIAMSBURG
255	15380	0	MA	WILLIAMSTN	WLTWMAWADS0	126	413	WILLIAMSTN
255	15380	0	MA	WILLIAMSTN	WLTWMAWADS0	126	413	WILLIAMSTN
255	15380	0	MA	WILLIAMSTN	WLTWMAWADS0	126	413	WILLIAMSTN
256	15421	0	MA	WILMINGTON	WLMGMAMADS0	128	978	WILMINGTON
257	15451	0	MA	WINCHENDON	WNDNMAGRRS1	128	978	WINCHENDON
257	15451	0	MA	WINCHENDON	WNDNMAGRRS1	128	978	WINCHENDON
257	15451	0	MA	WINCHENDON	WNDNMAGRRS1	128	978	WINCHENDON
258	15456	0	MA	WINCHESTER	WNCHMAMADS1	128	781	WINCHESTER
258	15456	0	MA	WINCHESTER	WNCHMAMADS1	128	781	WINCHESTER
258	15456	0	MA	WINCHESTER	WNCHMAMADS1	128	781	WINCHESTER
259	15543	0	MA	WINTHROP	WNTHMAMADS0	128	617	WINTHROP
259	15543	0	MA	WINTHROP	WNTHMAMADS0	128	617	WINTHROP
259	15543	0	MA	WINTHROP	WNTHMAMADS0	128	617	WINTHROP
260	15573	0	MA	WOBURN	WNCHMAMADS1	128	781	WOBURN
260	15573	0	MA	WOBURN	WNCHMAMADS1	128	781	WOBURN
260	15573	0	MA	WOBURN	WNCHMAMADS1	128	781	WOBURN
260	15573	0	MA	WOBURN	WNCHMAMADS1	128	781	WOBURN
261	15647	0	MA	WORCESTER	WRCSMACEDS3	128	508	WORCESTER
262	15656	0	MA	WORTHINGTN	WOTNMAWIRS1	126	413	WORTHINGTON
263	15664	0	MA	WRENTHAM	WRHMMASORS1	128	508	WRENTHAM
263	15664	0	MA	WRENTHAM	WRHMMASORS1	128	508	WRENTHAM
263	15664	0	MA	WRENTHAM	WRHMMASORS1	128	508	WRENTHAM
263	15664	0	MA	WRENTHAM	WRHMMASORS1	128	508	WRENTHAM

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TII OCN_	COMPANY_1,C,70	KEY_1,C,70	CC ET_ID,N,8,0
5	9102 VERIZON NEW ENGLAND INC.	ACTONMA	8 0
5	9102 VERIZON NEW ENGLAND INC.	ACTONMA	8 1
5	9102 VERIZON NEW ENGLAND INC.	ACTONMA	8 2
5	9102 VERIZON NEW ENGLAND INC.	ACTONMA	8 3
5	9102 VERIZON NEW ENGLAND INC.	ADAMSMA	8 4
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5	9102 VERIZON NEW ENGLAND INC.	ANDOVERMA	8 10
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5	9102	VERIZON NEW ENGLAND INC.	BLACKSTONEMA	8	55
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5	9102	VERIZON NEW ENGLAND INC.	BROCKTONMA	8	80
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5	9102	VERIZON NEW ENGLAND INC.	CAMBRIDGEMA	5	91
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5	9102	VERIZON NEW ENGLAND INC.	CARVERMA	7	96
5	9102	VERIZON NEW ENGLAND INC.	CARVERMA	7	97
5	9102	VERIZON NEW ENGLAND INC.	CARVERMA	7	98
5	9102	VERIZON NEW ENGLAND INC.	CATAUMETMA	7	99
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5	9102	VERIZON NEW ENGLAND INC.	CHARLESTNMA	8	106
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5	9102	VERIZON NEW ENGLAND INC.	CHATHAMMA	7	110
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5	9102	VERIZON NEW ENGLAND INC.	CHELSEAMA	8	112
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5	9102	VERIZON NEW ENGLAND INC.	CHESTERFLDMA	6	114
5	9102	VERIZON NEW ENGLAND INC.	CHESTERFLDMA	6	115
5	9102	VERIZON NEW ENGLAND INC.	CHESTERFLDMA	6	116
5	9102	VERIZON NEW ENGLAND INC.	CHICOPEEMA	6	117
5	9102	VERIZON NEW ENGLAND INC.	CHICOPEEMA	6	118
5	9102	VERIZON NEW ENGLAND INC.	CHILMARKMA	5	119
5	9102	VERIZON NEW ENGLAND INC.	CLINTONMA	1	120
5	9102	VERIZON NEW ENGLAND INC.	CLINTONMA	1	121
5	9102	VERIZON NEW ENGLAND INC.	COHASSETMA	7	122
5	9102	VERIZON NEW ENGLAND INC.	COHASSETMA	7	123
5	9102	VERIZON NEW ENGLAND INC.	COHASSETMA	7	124
5	9102	VERIZON NEW ENGLAND INC.	COLRAINMA	5	125
5	9102	VERIZON NEW ENGLAND INC.	COLRAINMA	5	126
5	9102	VERIZON NEW ENGLAND INC.	CONCORDMA	5	127
5	9102	VERIZON NEW ENGLAND INC.	CONCORDMA	5	128
5	9102	VERIZON NEW ENGLAND INC.	CONCORDMA	5	129
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5	9102	VERIZON NEW ENGLAND INC.	CONWAYMA	8	132
5	9102	VERIZON NEW ENGLAND INC.	CUMMINGTONMA	5	133
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5	9102	VERIZON NEW ENGLAND INC.	DANVERSMA	7	137
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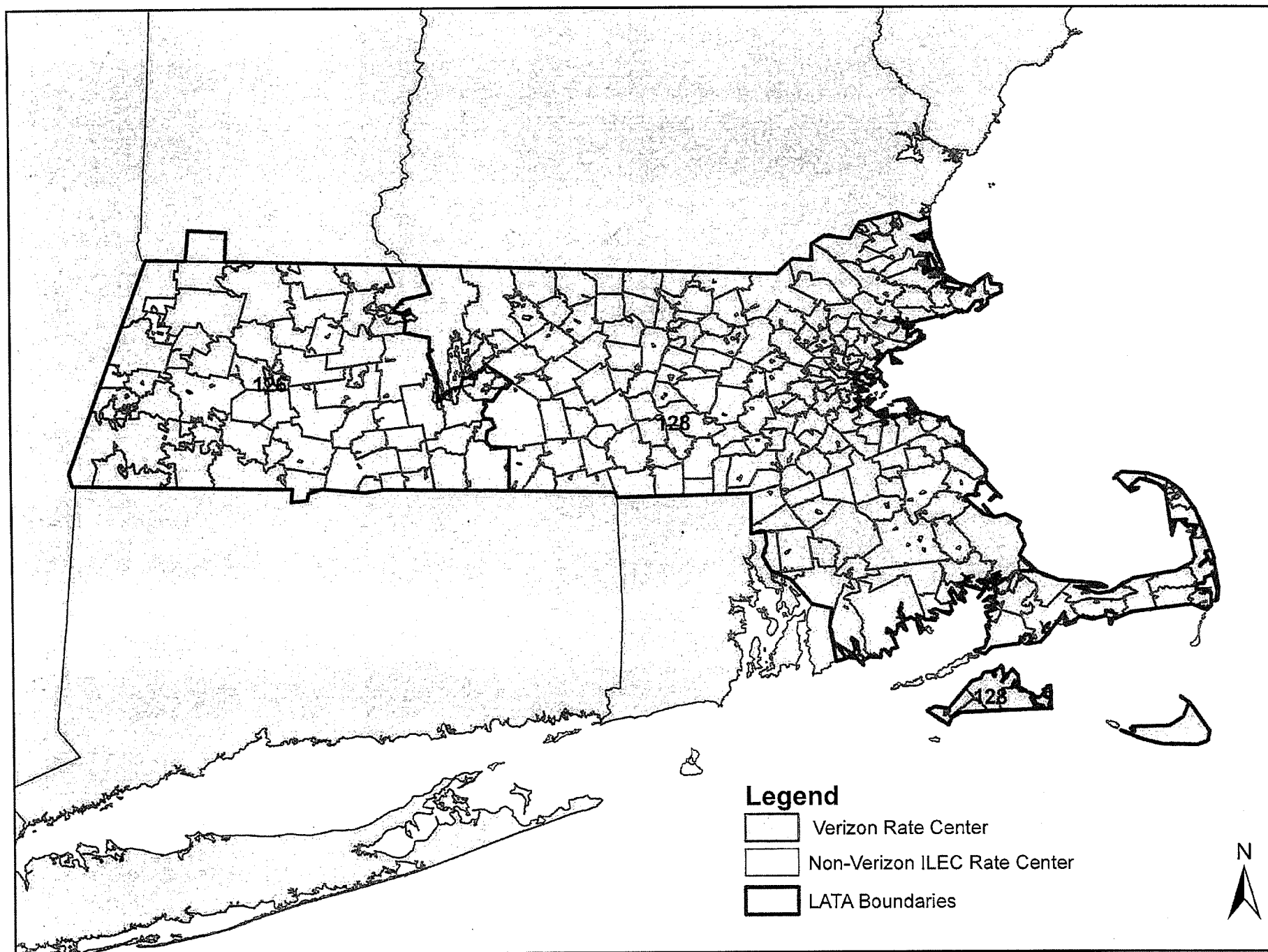
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5	9102	VERIZON NEW ENGLAND INC.	WALTHAMMA	3	537
5	9102	VERIZON NEW ENGLAND INC.	WALTHAMMA	3	538
5	9102	VERIZON NEW ENGLAND INC.	WALTHAMMA	3	539
5	9102	VERIZON NEW ENGLAND INC.	WAREHAMMA	1	540
5	9102	VERIZON NEW ENGLAND INC.	WAREHAMMA	1	541
5	9102	VERIZON NEW ENGLAND INC.	WAREMA	2	542
5	9102	VERIZON NEW ENGLAND INC.	WAREMA	2	543
5	9102	VERIZON NEW ENGLAND INC.	WAREMA	2	544
5	9102	VERIZON NEW ENGLAND INC.	WARRENMA	3	545
5	9102	VERIZON NEW ENGLAND INC.	WARRENRI	1	546
5	9102	VERIZON NEW ENGLAND INC.	WATERTOWNMA	1	547
5	9102	VERIZON NEW ENGLAND INC.	WATERTOWNMA	1	548
5	9102	VERIZON NEW ENGLAND INC.	WAYLANDMA	4	549
5	9102	VERIZON NEW ENGLAND INC.	WEBSTERMA	3	550
5	9102	VERIZON NEW ENGLAND INC.	WELLESLEYMA	1	551
5	9102	VERIZON NEW ENGLAND INC.	WELLESLEYMA	1	552
5	9102	VERIZON NEW ENGLAND INC.	WELLFLEETMA	1	553
5	9102	VERIZON NEW ENGLAND INC.	WELLFLEETMA	1	554
5	9102	VERIZON NEW ENGLAND INC.	WELLFLEETMA	1	555
5	9102	VERIZON NEW ENGLAND INC.	WELLFLEETMA	1	556
5	9102	VERIZON NEW ENGLAND INC.	WELLFLEETMA	1	557
5	9102	VERIZON NEW ENGLAND INC.	WESTBOROMA	1	558
5	9102	VERIZON NEW ENGLAND INC.	WESTBOROMA	1	559



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5	9102	VERIZON NEW ENGLAND INC.	WESTFIELDMA	3	560
5	9102	VERIZON NEW ENGLAND INC.	WESTFIELDMA	3	561
5	9102	VERIZON NEW ENGLAND INC.	WESTFORDMA	2	562
5	9102	VERIZON NEW ENGLAND INC.	WESTFORDMA	2	563
5	9102	VERIZON NEW ENGLAND INC.	WESTFORDMA	2	564
5	9102	VERIZON NEW ENGLAND INC.	WESTMINSTRMA	2	565
5	9102	VERIZON NEW ENGLAND INC.	WESTMINSTRMA	2	566
5	9102	VERIZON NEW ENGLAND INC.	WESTMINSTRMA	2	567
5	9102	VERIZON NEW ENGLAND INC.	WESTPORTMA	1	568
5	9102	VERIZON NEW ENGLAND INC.	WESTPORTMA	1	569
5	9102	VERIZON NEW ENGLAND INC.	WESTPORTMA	1	570
5	9102	VERIZON NEW ENGLAND INC.	WEYMOUTHMA	4	571
5	9102	VERIZON NEW ENGLAND INC.	WEYMOUTHMA	4	572
5	9102	VERIZON NEW ENGLAND INC.	WEYMOUTHMA	4	573
5	9102	VERIZON NEW ENGLAND INC.	WHITINSVLMA	1	574
5	9102	VERIZON NEW ENGLAND INC.	WHITMANMA	1	575
5	9102	VERIZON NEW ENGLAND INC.	WILBRAHAMMA	5	576
5	9102	VERIZON NEW ENGLAND INC.	WILBRAHAMMA	5	577
5	9102	VERIZON NEW ENGLAND INC.	WILLIAMSBGMA	2	578
5	9102	VERIZON NEW ENGLAND INC.	WILLIAMSBGMA	2	579
5	9102	VERIZON NEW ENGLAND INC.	WILLIAMSTNMA	3	580
5	9102	VERIZON NEW ENGLAND INC.	WILLIAMSTNMA	3	581
5	9102	VERIZON NEW ENGLAND INC.	WILLIAMSTNMA	3	582
5	9102	VERIZON NEW ENGLAND INC.	WILMINGTONMA	2	583
5	9102	VERIZON NEW ENGLAND INC.	WINCHENDONMA	2	584
5	9102	VERIZON NEW ENGLAND INC.	WINCHENDONMA	2	585
5	9102	VERIZON NEW ENGLAND INC.	WINCHENDONMA	2	586
5	9102	VERIZON NEW ENGLAND INC.	WINCHESTERMA	3	587
5	9102	VERIZON NEW ENGLAND INC.	WINCHESTERMA	3	588
5	9102	VERIZON NEW ENGLAND INC.	WINCHESTERMA	3	589
5	9102	VERIZON NEW ENGLAND INC.	WINTHROPMA	3	590
5	9102	VERIZON NEW ENGLAND INC.	WINTHROPMA	3	591
5	9102	VERIZON NEW ENGLAND INC.	WINTHROPMA	3	592
5	9102	VERIZON NEW ENGLAND INC.	WOBURNMA	1	593
5	9102	VERIZON NEW ENGLAND INC.	WOBURNMA	1	594
5	9102	VERIZON NEW ENGLAND INC.	WOBURNMA	1	595
5	9102	VERIZON NEW ENGLAND INC.	WOBURNMA	1	596
5	9102	VERIZON NEW ENGLAND INC.	WORCESTERMA	1	597
5	9102	VERIZON NEW ENGLAND INC.	WORTHINGTNMA	4	598
5	9102	VERIZON NEW ENGLAND INC.	WRENTHAMMA	3	599
5	9102	VERIZON NEW ENGLAND INC.	WRENTHAMMA	3	600
5	9102	VERIZON NEW ENGLAND INC.	WRENTHAMMA	3	601
5	9102	VERIZON NEW ENGLAND INC.	WRENTHAMMA	3	602

**EXHIBIT 5**



**CONFIDENTIAL EXHIBIT 6**

This page contains trade secrets or confidential information and will be separately filed

**CONFIDENTIAL EXHIBIT 7**

This page contains trade secrets or confidential information and will be separately filed

**EXHIBIT 8**





DATE	DOCUMENT ID	DESCRIPTION	FILING	EXPED	PENALTY	CERT	COPY
09/14/2000	200025800014	DOMESTIC ARTICLES/FOR PROFIT (ARF)	85.00	.00	.00	.00	.00

**Receipt**

This is not a bill. Please do not remit payment.

NATHANIEL HAWTHORNE  
27600 CHAGRIN BLVD  
NO. 260  
CLEVELAND, OH 44122

# STATE OF OHIO

**Ohio Secretary of State, J. Kenneth Blackwell**

1180608

It is hereby certified that the Secretary of State of Ohio has custody of the business records for  
**NEXUS COMMUNICATIONS, INC.**

and, that said business records show the filing and recording of:

Document(s)  
**DOMESTIC ARTICLES/FOR PROFIT**

Document No(s):  
**200025800014**



United States of America  
State of Ohio  
Office of the Secretary of State

Witness my hand and the seal of  
the Secretary of State at Columbus,  
Ohio this 11th day of September,  
A.D. 2000.

*J. Kenneth Blackwell*  
Ohio Secretary of State



Prescribed by **J. Kenneth Blackwell**

Please obtain the amount and mailing instructions from the Forms Inventory List (using the 3 digit form # located at the bottom of this form). To obtain the Forms Inventory List or for assistance, please call Customer Service:

Central Ohio: (614)-466-3910 Toll Free: 1-877-SOS-FILE (1-877-767-3453)

Expedite this form

Yes/No

## ARTICLES OF INCORPORATION

(Under Chapter 1701 of the Ohio Revised Code)

Profit Corporation

The undersigned, desiring to form a corporation, for profit, under Sections 1701.01 et seq. of the Ohio Revised Code, do hereby state the following:

FIRST. The name of said corporation shall be:  
Nexus Communications, Inc.

SECOND. The place in Ohio where its principal office is to be located is  
Lewis Center, Franklin County, Ohio  
(city, village or township)

THIRD. The purpose(s) for which this corporation is formed is:  
To provide local and long distance telecommunications, internet access, cellular, paging and  
other telecommunications services.

FOURTH. The number of shares which the corporation is authorized to have outstanding is: 100  
(Please state whether shares are common or preferred, and their par value, if any. Shares will be recorded as common with no par value unless otherwise indicated.)

IN WITNESS WHEREOF, we have hereunto subscribed our names, on September 10, 2000  
(date)

Signature: Nathaniel Hawthorne, Incorporator  
Name: Nathaniel Hawthorne

Signature: Paul Karas, Incorporator  
Name: Paul Karas

Signature: Marcia Schmidt, Incorporator  
Name: Marcia Schmidt



Prescribed by **J. Kenneth Blackwell**

Please obtain fee amount and mailing instructions from the Forms Inventory List (using the 3 digit form # located at the bottom of this form). To obtain the Forms Inventory List or for assistance, please call Customer Service:  
Central Ohio: (614) 466-3910 Toll Free: 1-877-SOS-FILE (1-877-767-3453)

### ORIGINAL APPOINTMENT OF STATUTORY AGENT

The undersigned, being at least a majority of the incorporators of Nexus Communications, Inc.  
hereby appoint Nathaniel Hawthorne, to be statutory agent upon whom any process, notice or  
demand required or permitted by statute to be served upon the corporation may be served. The complete address of the agent is:

27600 Chagrin Blvd., Suite 260  
(street name and number P.O. Boxes are not acceptable)  
Cleveland, Ohio 44122  
(city, village or township) (zip code)

Signature: \_\_\_\_\_  
Name: Nathaniel Hawthorne

Signature: Paul Karas  
Name: Paul Karas

Signature: Marcia Schmidt  
Name: Marcia Schmidt

### ACCEPTANCE OF APPOINTMENT

The undersigned, Nathaniel Hawthorne, named herein as the statutory agent for  
Nexus Communications, Inc., hereby acknowledges and accepts the  
appointment of statutory agent for said corporation.

Signature: Nathaniel Hawthorne

**United States of America  
State of Ohio  
Office of the Secretary of State**

*I, Jon Husted, do hereby certify that I am the duly elected, qualified and present acting Secretary of State for the State of Ohio, and as such have custody of the records of Ohio and Foreign business entities; that said records show NEXUS COMMUNICATIONS, INC., an Ohio corporation, Charter No. 1180608, having its principal location in Lewis Center, County of Franklin, was incorporated on September 11, 2000 and is currently in GOOD STANDING upon the records of this office.*



*Witness my hand and the seal of the  
Secretary of State at Columbus, Ohio  
this 2nd day of November, A.D. 2011*

*Jon Husted*

Ohio Secretary of State

Validation Number: V2011306N1629E

**CONFIDENTIAL EXHIBIT 9**

This page contains trade secrets or confidential information and will be separately filed