

THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

Before Commissioners: Mark Sievers, Chairman
Thomas E. Wright
Shari Feist Albrecht

In the Matter of a General Investigation to)
Review and Determine Whether the Kansas)
Universal Service Fund (KUSF) Should)
Support all Lines or be Limited to a Primary) Docket No. 13-GIMT-260-GIT
Line, Whether KUSF Support Available to)
Competitive Eligible Telecommunications)
Providers Should be Limited, and Other)
Appropriate Issues Related to Initial or)
Supplemental KUSF Support.)

**ORDER OPENING DOCKET, REQUESTING COMMENTS, AND DIRECTING
PARTIES TO FILE ENTRIES OF APPEARANCE**

The above-captioned matter comes before the State Corporation Commission of the State of Kansas (Commission) for consideration and decision. Having reviewed its files and records and being duly advised in the premises, the Commission makes the following findings:

I. The Kansas Universal Service Fund

1. On March 1, 1997, pursuant to K.S.A. 66-2002(h) and K.S.A. 66-2008, the Commission established the Kansas Universal Service Fund (KUSF). The KUSF was created to further the policy goals espoused in K.S.A. 66-2001. The KUSF currently provides: 1) subsidies to Eligible Telecommunications Carriers (ETCs) to provide universal service in high-cost areas (High Cost Support); 2) subsidies for low-income persons (Lifeline); 3) subsidies for the hearing impaired or people with disabilities (Telecommunications Relay Service and Telecommunications Access Program); and 4) subsidies for expanding technology solutions for schools, hospitals, and libraries in Kansas (Kan-Ed).

2. Pursuant to K.S.A. 66-2008(a), the KUSF is funded by contributions from telecommunications carriers, telecommunications public utilities, wireless telecommunications service providers, and to the extent not prohibited by federal law, interconnected Voice over Internet Protocol (VoIP) providers.

3. Only carriers designated as ETCs by the Commission are eligible to receive High-Cost KUSF support. On December 5, 1997, in Docket No. 98-GIMT-241-GIT, the Commission designated all Incumbent Local Exchange Carriers (ILECs) as ETCs. Competitive carriers must apply for ETC designation from the Commission. A competitive carrier granted such designation is referred to as a competitive ETC.

II. High Cost Support and The Identical Support Rule

4. Pursuant to K.S.A. 66-2008(b), High Cost Support from the KUSF is distributed in a “competitively neutral manner” to qualified ETCs. K.S.A. 66-2008(e) specifically provides that KUSF support for Rate-of-Return regulated ILECs is based on “embedded costs, revenue requirements, investments and expenses.” Commission Orders have governed distributions for all other ILECs and competitive ETCs.

A. High Cost Support in RLEC Study Areas

5. Pursuant to K.S.A. 66-2008(e), Rate-of-Return regulated ILECs -- often referred to as Rural LECs (RLECs) in Kansas -- receive High Cost Support based on embedded costs, revenue requirements, investments, and expenses. In general, the RLECs receive the difference between their intrastate revenue requirement and their intrastate revenues from the KUSF. Even though an RLEC does not receive KUSF support based on the number of qualifying access lines it serves, the number of the RLEC’s KUSF support eligible access lines is used to calculate the amount of KUSF support for a competitive ETC operating in the same study area.

6. In Docket No. 06-GIMT-1289-GIT, the Commission reaffirmed that in order to distribute KUSF funds in a “competitively neutral manner,” competitive ETCs operating in RLEC study areas should receive the same, or the “identical support,” that the RLEC receives. Therefore, competitive ETCs operating in an RLEC study area receive per line KUSF support based on the RLEC’s annual KUSF support and the RLEC’s number of KUSF support eligible lines. For example, if the RLEC receives \$300,000 in yearly support and has 2,000 KUSF support-eligible lines, a competitive ETC seeking KUSF support in the same study area would receive \$150 per eligible access line that it has per year; thus, receiving the “identical support” that the RLEC receives.

B. High Cost Support in Non-RLEC Study Areas

7. All other ILECs receive High Cost Support based on a forward-looking high-cost model. The specifics of the model are addressed in Docket No. 99-GIMT-326-GIT and Docket No. 02-GIMT-068-KSF.

8. The forward-looking high-cost model adopted by the Commission provides KUSF support for wire centers where the average cost to provide universal service exceeds 125% of the statewide average, or \$36.45 per month per line. The forward-looking high-cost model utilized by the Commission divides Non-RLEC wire centers into Zone 1 and Zone 2 to more accurately determine support levels. Zone 1 includes the Base Rate Area (BRA), an area generally within and up to 3 miles outside the city limits; and Zone 2 includes all areas outside of the BRA. KUSF support for Zone 1 is generally lower than the Zone 2 KUSF support.

9. Competitive ETCs operating in Non-RLEC study areas also receive the “identical support” that the ILEC qualifies to receive. Therefore, if the ILEC receives KUSF support of

\$2.00 per access line per month in Zone 1 of a wire center, a competitive ETC operating in that same wire center will receive KUSF support of \$2.00 per access line per month.

C. Federal Action

10. The Federal Communications Commission (FCC) recently discontinued the use of the “identical support rule” in determining Federal Universal Service Fund (FUSF) support. In its November 18, 2011, *Report and Order and Further Notice of Proposed Rulemaking* (November 18th Order), ¶ 296, the FCC stated that “rapid growth in support to competitive ETCs as a result of the identical support rule threatened the sustainability of the [federal] universal service fund” and that “providing the same per-line support amount to competitive ETCs had the consequence of encouraging wireless competitive ETCs to supplement or duplicate existing services while offering little incentive to maintain or expand investment in unserved or underserved areas.”

11. The November 18th Order froze the amount of identical FUSF support paid to a competitive ETC for a study area as of December 31, 2011, and effective July 1, 2012, began to phase-out the identical support rule over a 5-year period.

D. State of Kansas Action

12. In Docket No. 10-GIMT-667-KSF, the United Telephone Companies of Kansas d/b/a CenturyLink (CenturyLink) urged the Commission to address the issues of “identical support” and whether a cap should be placed on the KUSF support available to competitive ETCs.

13. The Commission directed Staff to address the issue of “identical support” in a separate docket. Docket No. 11-GIMT-420-GIT was opened to address several issues, including the KUSF cost-model and the “identical support” rule. However, the Commission issued an

Order stating the Docket would focus on the issue of a forward-looking high-cost model for KUSF support for Kansas price cap carriers and further suspended the Docket until after the FCC adopts a new cost model.

III. The Primary Line Rule

14. The “primary line rule” is a rule that has been discussed at both the State and Federal levels and would limit USF support to only one line, or the primary line, of a household or a business. The idea surrounding the implementation of a primary line rule was discussed by the FCC in a *Report and Order* issued May 8, 1997:

[P]roviding universal service support in high cost areas for second residential connections, second residences, and business with multiple connections may be inconsistent with the goals of universal service in that business and residential customers that presumably can afford to pay rates that reflect the carrier’s costs to provide services nevertheless would receive supported rates. We are also mindful that overly expansive universal service support mechanisms potentially could harm all consumers by increasing the expense of telecommunications service for all.

A. Federal Action

15. On February 27, 2004, the Federal-State Joint Board on Universal Service (Joint Board) submitted recommendations to the FCC regarding the preservation of universal service and competition in the telecommunications industry. The Joint Board recommended that the FCC implement a primary line rule for Federal high-cost support.

16. The FCC was unable to implement a primary line rule due to Congressional action. The Consolidated Appropriations Act passed by each Congress since the 108th has appropriated money to the FCC on the condition that the funds not be used to “modify, amend, or change its rules or regulations for universal service support payments to implement the February 27, 2004 recommendations of the Federal-State Joint Board on Universal Service regarding single connection or primary line restrictions on universal service support payments.”

See Consolidated Appropriations Act, 2012, P.L. 112-74; Division C; Title V; Sec. 511 (Dec. 23, 2011).

B. State of Kansas Action

17. In Docket No. 99-GIMT-326-GIT, the Commission considered whether providing KUSF support to the primary line of a household or a business was adequate to ensure the availability of universal service. Although the Commission found that “providing KUSF support for the primary line adequately ensures the availability of universal service,” the Commission ultimately determined on February 24, 2002, that due to the decreasing size of the KUSF and the significant costs associated with implementing a primary line approach, it would not implement distribution of KUSF support on a primary line basis at that time.

18. In Docket No. 10-GIMT-667-KSF, the Citizens’ Utility Ratepayer Board (CURB) urged the Commission to revisit the primary line support issue.

19. The Commission directed Staff to address the “primary line rule” in a separate docket. Docket No. 11-GIMT-420-GIT was opened to address several issues including the “primary line rule.” However, the Commission issued an Order stating the Docket would focus on the issue of a forward-looking high-cost model for KUSF support for Kansas price cap carriers and suspended the Docket until after the FCC adopts a new high cost model.

IV. Purpose of this Docket

20. Commission Staff (Staff) has submitted a Report and Recommendation dated October 3, 2012. The Report and Recommendation is attached hereto and made a part hereof by reference. Staff finds that it is appropriate at this time to re-evaluate the issues regarding the “identical support rule,” the “primary line rule,” and other issues related to supplemental KUSF support. Therefore, Staff recommends the Commission open a proceeding to address: (1)

whether, and how, to implement a primary line policy for KUSF support purposes; (2) whether the identical support or equal payment policy should be modified for competitive ETCs; and (3) other issues related to supplemental KUSF support.

21. Staff provides a thorough analysis of the status of KUSF funding as it relates to these issues in its Report and Recommendation. Recognizing that analysis of these issues requires a review of federal and state statutes, court interpretations, FCC Orders, and past Commission Orders, Staff recommends the Commission begin addressing these issues by seeking comments and reply comments from all telecommunication providers operating in the State.

22. Specifically, Staff recommends the Commission seek comments on the following issues:

1. Should KUSF support be limited to one-line, per customer (household or business), per carrier, or alternatively, be limited to one-line, per customer.
2. Could KUSF support be capped at an amount for a service area (or even the wire center or zone level in AT&T and CenturyLink service areas) and allocated between providers eligible for KUSF support in that area?
3. If more than one business or household has the same address, how would the primary line be identified? Alternatively, should only one line be supported per address, regardless of the number of businesses or households at the same address?
4. What administrative steps, costs, and benefits, may be associated with each approach?
5. Do any Kansas statutes need to be modified for the Commission to implement a primary line approach?
6. In consideration of the FCC's decision to eliminate Federal USF support for competitive ETCs, should the Commission take similar steps with regard to the KUSF?
7. Any other items that the parties may believe are relevant to the payment of supplemental KUSF support related to access line growth?

23. The Commission finds Staff's findings and recommendations to be reasonable and hereby adopts the same.

V. Procedural Matters

24. The Commission finds that all carriers or entities that contribute to the KUSF (i.e., ETCs, competitive local exchange carriers, interexchange carriers, interconnected Voice over Internet Protocol providers, and wireless providers), and CURB should be parties to this docket.

25. The Commission anticipates carriers or entities that will want to be actively involved in this proceeding will be fewer than all carriers or entities being served with this Order. Active parties are those carriers or entities that desire to be involved in litigating issues that will be identified and explored in this general investigation. Only those entities that participate as active parties in this docket will be served with pleadings, testimony, briefs, and procedural orders as this proceeding progresses; only active parties will be given notice of and allowed to participate in hearings, roundtables, or other sessions that are scheduled in this proceeding. Those entities that desire to participate as an active party in this proceeding shall file an Entry of Appearance within fifteen (15) days of the issuance of this Order. Any carrier or entity that is served with this Order and chooses not to participate as an active party will not be served with pleadings, testimony, briefs, and procedural orders during litigation of this docket. If a carrier or entity did not previously enter its appearance in this proceeding but later desires to become an active party, that carrier or entity may do so by submitting an Entry of Appearance that states whether it is willing to receive electronic service and, if so, provides an email address for service, as discussed above and below. All entities being served with this Order will be served with any Commission decision that is a final order. Upon receipt of a Commission final

order, an entity that chose not to actively participate in this docket will be allowed to petition for reconsideration, but the entity will not be allowed to introduce new issues inasmuch as it was given notice of the adjudicative proceeding with service of this Order but chose not to participate.

26. The Commission urges entities that are involved as active parties to this proceeding to consent to receipt of pleadings, testimony, briefs, and orders by electronic service without a hard-copy follow-up as required by K.A.R. 82-1-216(a)(6). A party may note its consent on its Entry of Appearance. Confidential papers will be served either electronically, if confidentiality can be maintained, or by some other secure method, such as providing information on compact disc. Testimony, briefs, and other pleadings must be served electronically by 3:00 p.m. on the date due, without requiring service among the parties of a follow-up hard copy. However, the original and at least seven paper copies of testimony, briefs, and other pleadings must still be filed in the Commission's docket room by close of business on the date of the deadline. K.A.R. 82-1-215(a). Any electronic service of Commission or Prehearing Officer's orders without follow-up hard copies will specifically state in the electronic message serving the order that the electronic message constitutes service of the attached order and that a hard copy will not follow. Parties are directed to maintain accurate, current lists of electronic service email addresses based on information contained within the Commission's orders. Electronic service of testimony, briefs, and other pleadings shall include service on Andrew French, Advisory Counsel, at a.french@kcc.ks.gov.

27. As the Commission is not seeking comments that are confidential in nature, the Commission will not issue a Protective Order or a Discovery Order at this time.


IT IS, THEREFORE, BY THE COMMISSION ORDERED THAT:

- A. The Commission adopts Staff's recommendation to open a general investigation to address the issues listed above.
- B. All carriers or entities that contribute to the KUSF, and CURB, are made parties to this docket. However, parties wishing to become active parties as discussed above shall enter their appearance within 15 days of the issuance of this Order. Parties that enter their appearance shall also provide an e-mail address and indicate their consent to electronic service.
- C. Parties shall file Comments on the issues listed in paragraph 22 above by Monday, December 10, 2012.
- D. Parties shall file Reply Comments by Monday, January 7, 2013.
- E. Parties have 15 days, plus three days if service is by mail, from the date this Order was served in which to petition the Commission for reconsideration of any issue or issues decided herein. K.S.A. 66-118b; K.S.A. 77-529(a)(1).
- F. The Commission retains jurisdiction over the subject matter and parties for the purpose of issuing such further order, or orders, as it may deem necessary.

BY THE COMMISSION IT IS SO ORDERED.

Sievers, Chairman; Wright, Commissioner; Albrecht, Commissioner

Dated: **OCT 25 2012**


ORDER MAILED OCT 26 2012

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Mark Sievers, Chairman
Thomas E. Wright, Commissioner
Shari Feist Albrecht, Commissioner

Sam Brownback, Governor

**REPORT AND RECOMMENDATION
UTILITIES DIVISION**

TO: Chairman Mark Sievers
Commissioner Thomas E. Wright
Commissioner Shari Feist Albrecht

FROM: Sandy Reams

DATE: October 3, 2012

DATE SUBMITTED TO EXECUTIVE DIRECTOR: 10/4/12

DATE SUBMITTED TO LEGAL: 10-11-12

DATE SUBMITTED TO COMMISSIONERS: _____

SUBJECT: *Investigation to Review and Determine Whether the Kansas Universal Service Fund (KUSF) Should Support all Lines or be Limited to a Primary Line, Whether KUSF Support Available to Competitive Eligible Telecommunications Providers Should be Limited, and Other Appropriate Issues Related to Initial or Supplemental KUSF Support.*

EXECUTIVE SUMMARY:

The Commission established the Kansas Universal Service Fund (KUSF), effective March 1, 1997, pursuant to K.S.A. 66-2002(h). In a September 24, 2010, Order in Docket No. 10-GIMT-667-KSF,¹ the Commission determined that a new docket should be opened to address: (1) whether the amount of KUSF funds available to Competitive Eligible Telecommunications Carriers (ETCs) should be capped; (2) whether KUSF support should be limited to one line per household, referred to as the primary line; and (3) any other issues pertaining to supplemental KUSF support that may be appropriate.

¹ *Generic Proceeding to Address Kansas Universal Service Fund Support Supplemental Funding Procedures, as Adopted by the Commission in Docket No. 00-GIMT-842-GIT, Docket No. 10-GIMT-667-GIT (Docket 10-667), September 24, 2012, Order Redefining Eligible Line for KUSF Support, Limiting Frequency of Requests for Supplemental KUSF Support, Requiring Net 12- Month Increase of Five Percent or Greater, Requiring Inclusion of Previous Commission Adjustments, Setting Appropriate Date for Payment of Supplemental KUSF Support, Declining to Rule Upon Issues Not Noticed Up in This Docket, and Directing Staff to Open Docket (September 24, 2012 Order).*

STATE CORPORATION
COMMISSION
OCT 04 2012
PATRICE PETERSEN-KLEIN
EXECUTIVE DIRECTOR

Staff recommends that the Commission open a new proceeding to address: (1) should KUSF support be limited to the primary line of a household and/or business, (2) should the KUSF support available to a competitive ETC be capped, and (3) other appropriate issues related to initial or supplemental KUSF support.

BACKGROUND:

The Commission established the KUSF, effective March 1, 1997, pursuant to K.S.A. 66-2002(h). The KUSF initially provided support to the Incumbent Local Exchange Carriers (ILECs), on a revenue-neutral basis, to replace intrastate switched access revenues lost as a result of reducing their intrastate switched access rates to their interstate switched access rate levels. The Commission began to transition the KUSF to a cost-basis in April 1998.²

A primary line policy will likely reduce the KUSF support paid to AT&T, CenturyLink, and competitive ETCs operating in both the rural and non-rural ILEC study areas. The rural LECs will not be affected since their KUSF support is based on company-specific intrastate revenue-requirement determinations, as provided by K.S.A. 2011 Supp. 66-2008 and the *Nemaha/Bluestem* court decisions.³

1. AT&T and CenturyLink High-Cost Areas

The Commission adopted a forward-looking high-cost model in Docket No. 99-GIMT-326-GIT (Docket 99-326)⁴ to determine the KUSF support available for an eligible line in AT&T's and CenturyLink's study areas. The model recognizes 100% of a carrier's intrastate loop and local switching cost; however, a portion of these costs are recovered via the Federal Communications Commission's (FCC) separations process through Federal Universal Service Fund (USF) support. Therefore, the KUSF support determined by the high-cost model is reduced by the amount of Federal USF loop and local switching support received by the ILEC.

Seventy-one of AT&T's wire centers are classified as high-cost areas and qualify for KUSF support. CenturyLink has 112 high-cost wire centers. Each wire center is disaggregated into two zones: Zone 1 includes the Base Rate Area (BRA), an area generally within and up to 3 miles outside the city limits; and Zone 2 includes all areas outside of the BRA.⁵ KUSF support in AT&T's service area ranges from \$1.33 to \$13.08 per line in Zone 1 and from \$2.85 to \$226.45 per line for Zone 2. For CenturyLink's study areas, KUSF Zone 1 support ranges from \$0.15 up to \$41.68 per line per month while KUSF support for Zone 2 ranges from \$3.08 to \$243.23 per line per month.

² *In the Matter of Southwestern Bell Telephone Company's Cost to Provide Local Service, As Required by K.S.A. 1996 Supp. 66-2008(d)*, Docket No. 98-SWBT-677-GIT, April 29, 1998, Order Opening Docket and Assessing Costs.

³ *Bluestem Telephone Co. et al. v. Kansas Corporation Commission*, 33 Kan. App. 2d 817 (2005).

⁴ *In the Matter of an Investigation Into the Kansas Universal Service Fund (KUSF) Mechanism for the Purpose of Modifying the KUSF and Establishing a Cost-Based Fund*, Docket No. 99-GIMT-326-GIT, September 30, 1999, Order No. 10: Order Adopting a Forward-Looking Cost Methodology for Purposes of Determining KUSF Support and Selecting the FCC's Proxy Cost Model.

⁵ Docket 99-326, December 29, 1999, Order 16 Determining the Kansas-Specific Inputs to the FCC Cost Proxy Model to Establish a Cost-Based Kansas Universal Service Fund, ¶ 131.

Competitive ETCs currently receiving KUSF support for AT&T's service area include: Nex-Tech, Inc. (Nex-Tech); Nex-Tech Wireless, LLC (Nex-Tech Wireless); Sage Telecom, Inc. (Sage); United Wireless Communications, Inc. (United Wireless); N.E. Colorado Cellular, Inc. d/b/a Viaero Wireless (Viaero); and Westlink Communications, LLC (Westlink). Two competitive ETCs, H&B Cable and Nex-Tech Wireless, receive KUSF support for CenturyLink service areas.

2. Rural LEC Study Areas

Prior to the enactment of K.S.A. 66-2008(e), the Commission determined that competitive ETCs would receive the same amount of KUSF support as that available to a rural LEC. This approach is referred to as both the "equal-payment" and "identical support" method. After K.S.A. 66-2008(e) was enacted, the Kansas Court of Appeals remanded the issue of competitive neutrality back to the Commission.⁶ In Docket No. 06-GIMT-1289-GIT,⁷ the Commission reaffirmed earlier decisions that the equal-payment method is competitively neutral.⁸ Thus, the annual KUSF support paid to a competitive ETC operating within a RLEC's study area is determined by dividing the total annual KUSF support paid to the RLEC by the September 30th annual lines that qualify for KUSF support, as reported by the RLEC.

Four competitive ETCs, Epic Touch; Nex-Tech Wireless; United Wireless, Viaero and Westlink, are currently receiving KUSF support in RLEC study areas.

Prior Commission Investigation Regarding Providing KUSF for Only the Primary Line

In Docket 99-326, the Commission considered whether providing KUSF support for only one line, or the primary line, of a household or a business was adequate to ensure the availability of universal service.⁹ In paragraph 68 of its September 30, 1999, Order No. 10, the Commission stated,¹⁰

[P]roviding KUSF support for the primary line adequately ensures the availability of universal service. The goal of universal service is to ensure that the greatest number of customers feasible have access to the telecommunications network. A

⁶ *Bluestem Telephone Co. et al. v. Kansas Corporation Commission*, 33 Kan. App. 2d 817 (2005).

⁷ *In the Matter of an Investigation into the Effect of K.S.A. 66-2008(e) on Competitively Neutral Distribution of KUSF Support as Remanded to the Commission by the Decision of the Court of Appeals in Bluestem Telephone Co., et al v. Kansas Corporation Commission*, Docket No. 06-GIMT-1289-GIT (Docket 1289).

⁸ *Id.*, March 7, 2007, Order: (A) Commission Adopts the FCC Definition of Competitive Neutrality and Its Clarification of Technological Neutrality; (B) Commission's Interim Method for Computing Support to CETCs Entering the Rural Rate of Return Regulated ILEC's Service Area is Competitively Neutral and Adopted Under Further Order; (C) the Rural Rate of Return Regulated ILEC Shall Continue to Have its Support and Any Adjustments Thereto, Calculated on the Basis of K.S.A. 66-2008(e); (D) Commission Will Not Subject CETCs to the Same Audit Procedures Applicable to Rural ILECs as Stated in Order; and (E) Instructing Staff to File a Memo Which May Be the Basis for Opening A Generic Proceeding to Explore the Possibility of Expanding the ETC Certification Process for KUSF Purposes.

⁹ *In the Matter of an Investigation Into the Kansas Universal Service Fund (KUSF) Mechanism for the Purpose of Modifying the KUSF and Establishing a Cost-Based Fund*, Docket No. 99-GIMT-326-GIT.

¹⁰ Docket 99-326, September 30, 1999, Order No. 10: Order Adopting a Forward Looking Cost Methodology for Purposes of Determining KUSF Support and Selecting the FCC's Proxy Cost Model.

single line or connection is all that is needed to achieve this goal. The services and facilities included in the definition of universal service are: single party, two-way voice grade calling; stored program controlled switching with vertical services capability; E911 capability; tone dialing; access to operator services; access to directory assistance; and equal access to long distance services. K.S.A. 66-1,187. By providing support only for the primary line, the Commission furthers the goal to ensure availability of universal service. Providing support for additional lines per customer is not necessary to meet the goals of universal service as defined.

The Commission, in paragraph 31, also noted that the Federal Telecommunications Act (FTA) provides guidance on the structure and implementation of a universal service fund, and specifically:

Section 254(b) of the FTA states that “[q]uality services should be available at just, reasonable and affordable rates.” 47 U.S.C. 254(b)(1). Subsection (b)(3) provides that low-income consumers, and consumers in rural and high cost areas, should have access to telecommunications services at rates that are reasonably comparable to rates charged in urban areas for similar services. A state commission may establish mechanisms to support universal service to the extent any state rules and regulations are not inconsistent with the FCC’s rules to preserve and advance universal service. 47 U.S.C. 254(f). The FTA specifically states that universal service support should be explicit and sufficient to achieve the purposes in Section 254 of the Act. 47 U.S.C. 254(e). 47 U.S.C. 254(i) provides that the FCC and the states should ensure that universal service is available at rates that are just, reasonable and affordable. U.S.C. 254(k) provides important guidance directing state commissions to “ensure that services included in the definition of universal service bear no more than a reasonable share of the joint and common costs of facilities used to provide those services.”

And, in paragraph 65, the Commission quoted the Federal Communications Commission’s (FCC) statement in its *Report and Order* issued May 8, 1997:¹¹

[P]roviding universal service support in high cost areas for second residential connections, second residences, and business with multiple connections may be inconsistent with the goals of universal service in that business and residential consumers that presumably can afford to pay rates that reflect the carrier’s costs to provide services nevertheless would receive supported rates. We are also mindful that overly expansive universal service support mechanisms potentially could harm all consumers by increasing the expense of telecommunications service for all.

To further explore the feasibility of adopting a primary line approach for KUSF support purposes, the Commission directed Staff to file a plan regarding the primary line approach no later than March 1, 2000.

¹¹ *In the Matter of Federal-State Joint Board on Universal Service*, Report and Order, CC Docket No. 96-45 (FCC 97-157) (May 8, 1997), ¶ 95.

On March 1, 2000, Staff filed a Memorandum Regarding Primary Line Basis for KUSF Support Payments. In the Memorandum, Staff identified several alternatives for identifying the primary line of a household or business, explained that consumers would need to be educated about what the KUSF supporting one line per household meant, and recognized that implementation would include several challenges.

Staff provided an analysis of the various definitions adopted by the FCC for primary and secondary lines for the ILECs, discussed the pros and cons of adopting each of the definitions, and how adoption of the definitions could be implemented for KUSF support purposes. Staff pointed out that the definitions would need to be technologically neutral to ensure any company qualifying for KUSF support could incorporate those definitions within their business reporting requirements. Staff also discussed the importance of consumer education regarding the KUSF and how it works, the cost of subsidized services, and making a provider choice to identify the primary line of the household or business. Staff also discussed implementation issues related to a primary line policy and concerns raised by Southwestern Bell Telephone Company d/b/a AT&T Kansas (AT&T) and the United Telephone Companies of Kansas d/b/a CenturyLink (CenturyLink) regarding cost issues relative to the primary line and the incremental cost of an additional line, and how those costs are accounted for within the cost model used to calculate their KUSF support. Staff noted various complexities related to the primary line approach, including: (1) the need for carriers to modify their billing systems, (2) porting KUSF between carriers, (3) identification of the primary line if a customer has service with more than one provider, (4) treatment of partial month service if a customer moves, and (5) how to identify the primary line if more than one household or business has the same address. Staff recommended that the Commission request comments on Staff's Memorandum.

In a March 17, 2000 Order, the Commission requested that the parties file comments no later than May 12, 2000, and scheduled a technical conference for May 31, 2000.

After numerous meetings with industry, on September 19, 2001, Staff filed a Memorandum addressing the parties' comments, the industry meeting, and providing an analysis and recommendations regarding the proposed primary line methodology.

On October 21, 2001, the Commission issued another Order seeking additional comments on the primary line issue. Initial comments were due November 16, 2001, and reply comments were due December 14, 2001.

On February 24, 2002, the Commission issued an Order to address implementation of a primary line policy.¹² The Commission noted that the parties did not oppose a primary line policy because the goals of universal service would not be met through the support of one line; instead, the parties' opposition resulted from the difficulties faced by customers and carriers alike and the cost of implementing the primary line methodology. Therefore, citing to the decreasing size of the KUSF and the significant costs associated with implementing a primary line approach, the Commission stated,

¹² Docket 99-326, Order Addressing Support of Primary Line, February 25, 2002.

We are persuaded by the comments of the parties that it would be complicated to implement support for only the primary line at this time. Because the KUSF is currently decreasing in size and a change to primary line support would involve significant cost, the Commission finds that it is not cost efficient to implement distribution of KUSF support on a primary line basis at this time.¹³

Recent Commission Proceedings in Which the Primary Line Policy Was Raised

A. Docket No. 10-GIMT-667-GIT

On April 14, 2010, Staff submitted a Memorandum to the Commission to recommend that the Commission open a generic proceeding to address whether the procedures for requesting supplemental KUSF support, adopted by the Commission in a May 25, 2000, Order in Docket No. 00-GIMT-842-GIT, should be modified. In its Memorandum, Staff explained that the supplemental KUSF support procedures applied to AT&T, CenturyLink, and any competitive Eligible Telecommunications Carrier (ETC) qualified to receive KUSF support. Staff further explained, in paragraph 9, that the supplemental KUSF support procedures do not apply to the rural ILECs because their KUSF support is based on company-specific audits and the resulting revenue requirements, not the number of access lines in service.

On June 16, 2010, the Commission opened a new proceeding, Docket No. 10-GIMT-667-GIT, to address the issues raised in Staff's Memorandum and requested parties to file comments by July 14, 2010, and reply comments by August 11, 2010, on: (1) whether the definition of a line eligible for supplemental KUSF support should be modified; (2) whether the frequency for filing supplemental funding requests was appropriate; (3) how to treat adjustments adopted by the Commission for one supplemental KUSF support request in a subsequent request for supplemental KUSF support; and (4) the appropriate effective date of payment for supplemental KUSF support.

On August 30, 2010, Staff submitted a Report summarizing the parties' comments on the issues identified by the Commission. Staff also explained that in addition to addressing the issues identified by the Commission, the Citizens' Utility Ratepayer Board (CURB) urged the Commission to revisit the primary line support issue in Docket 10-667 or in a separate proceeding. Staff also noted that CenturyLink proposed the Commission expand Docket 10-667 to address the issue of whether competitive ETCs should continue to receive the same amount of KUSF support as that available to the ILEC, referred to as the "equal-payment" or "identical support" method, or whether a cap should be placed on the KUSF support available to competitive ETCs. Staff stated that CenturyLink had explained that the FCC had recently clarified its policies to eliminate the "equal-payment" method and limit the Federal Universal Service Fund (FUSF) support available to competitive ETCs. Thus, Staff recommended that the Commission consider revisiting the primary line policy and the appropriateness of a cap on the KUSF support available to competitive ETCs. However, Staff recommended that these issues be addressed in a separate proceeding due to due process requirements and the scope of the 10-667 Docket.

¹³ Id., at ¶ 5.

On September 24, 2010, the Commission issued an Order adopting modifications to the KUSF procedures governing requests for KUSF support.¹⁴ In paragraph 23, the Commission directed Staff to open a new docket to address: (1) whether KUSF support should be limited to the primary line; (2) whether the amount of KUSF funds available to competitive ETCs should be capped; and (3) other issues pertaining to supplemental KUSF support that the parties suggest.

B. Docket No. 11-GIMT-420-GIT

On January 26, 2011, the Commission issued an Order opening Docket No. 11-GIMT-420-GIT to review the KUSF cost-model used to determine KUSF support for AT&T, CenturyLink, and competitive ETCs operating in their study areas. The Commission requested parties to the docket to file comments on various issues, including whether the “Commission should phase out competitive ETC KUSF support, similar to the proposal to phase out federal competitive ETC support in the National Broadband Plan, If so, what kind of process and timeframe might be appropriate?”¹⁵

On June 22, 2011, the parties filed comments and on July 22, 2011, the parties filed reply comments. On August 31, 2011, Staff filed a Report summarizing the parties’ positions. Due to the pending USF reforms before the FCC, Staff recommended that the Docket be suspended until after the FCC completes its USF reforms. On October 12, 2011, the Commission issued an Order addressing Staff’s Report and suspending the Docket until the FCC’s reforms that would impact the review of the high-cost model used to determine KUSF support for non-rural LECs are completed.

Federal Communications Commission Actions Regarding Primary Line Issue

In 2002, the FCC asked the Federal-State Joint Board on Universal Service (Joint Board) to review the FCC rules to ensure that the goals of “preserving universal service and fostering competition” were met.¹⁶ The Joint Board requested comments and held a forum regarding the designation and funding of ETCs in high-cost areas, and on February 27, 2004, released its Recommended Decision.

The Joint Board recommended that the FCC limit Federal high-cost support to one connection that provides access to the public switched telecommunications network (PSTN) and seek comments on restating the high-cost support for rural carriers in terms of first connections and on whether to restate high-cost support for non-rural carriers. The Joint Board also recommended that a per-line cap, adjusted by an index factor, be placed on the Federal high-cost support for areas served by rural LECs and where there is a competitive ETC.¹⁷

¹⁴ Docket 10-667, September 24, 2010, Order, ¶ 9.

¹⁵ *In the Matter of a Review of the Kansas Universal Service Fund, including the Forward-Looking High-Cost Model Used to Determine Cost-Based Kansas Universal Service Fund support for Price Cap Carriers and Competitive Eligible Telecommunications Carriers Offering Service In Price Cap Carrier Study Areas*, Docket No. 11-GIMT-420-GIT, January 26, 2011, Order, ¶ 15.

¹⁶ See *Federal-State Joint Board on Universal Service*, Order, CC Docket No. 96-45, 16 FCC Rcd 22642, ¶ 1 (2002) (*Referral Order*).

¹⁷ *Id.* at ¶3.

The FCC; however, did not adopt rules or regulations to limit Federal USF support to one connection because, effective with the 108th Congress, federal legislation has prohibited the FCC from using any of its appropriation funds to change its rules or regulations in order to limit Federal USF support payments to a single connection. Language in the Consolidated Appropriations Acts of each Congress since the 108th congress has been similar, stating,

None of the funds appropriated by this Act may be used by the Federal Communications Commission to modify, amend, or change its rules or regulations for universal service support payments to implement the February 27, 2004 recommendations of the Federal-State Joint Board on Universal Service regarding single connection or primary line restrictions on universal service support payments.¹⁸

The FCC; therefore, in a November 5, 2008, *Order on Remand and Report and Order and Further Notice of Proposed Rulemaking* (November 2008 Order),¹⁹ made numerous proposals, including proposals related to whether the same amount of Federal USF support should be provided to a competitive ETC and the ILEC and whether a family wireless service plan should be counted as a single line for Federal USF support purposes.²⁰

In May 2008, the FCC released an *Order* in which it capped the amount of Federal USF support for competitive ETCs at the level of the Federal USF support the Competitive ETCs in a state qualified to receive in March 2008, on an annualized basis.²¹ The FCC, however, did not take actions to limit the number of lines a household could have for Federal USF support purposes.

On November 18, 2011, the FCC released a *Report and Order and Further Notice of Proposed Rulemaking* to address numerous Federal USF reforms (November 2011 Order). The FCC determined that it would eliminate the payment of identical support to competitive ETCs.²² The FCC froze the amount of identical USF support paid to a competitive ETC for a study area as of December 31, 2011, and effective July 1, 2012, began to phase-out the identical support rule over a 5-year period.²³ The FCC also established a new mobility broadband support mechanism to support broadband services offered by wireless providers (Mobility Fund). The FCC reasoned, in paragraph 29, that the phase down of the identical support, in conjunction with the new Mobility Fund would “ensure that an average of over \$900 million is provided to mobile carriers for each of the first four years of reform (through 2015). The phase down of competitive

¹⁸ “Consolidated Appropriations Act, 2012, P.L. 112-74; Division C; Title V; Sec. 511 (Dec. 23, 2011).

¹⁹ *In the Matter of High-Cost Universal Service Support; Federal-State Joint Board on Universal Service; Lifeline and Link Up; Universal Service Contribution Methodology; Numbering Resource Optimization; Implementation of the Local Competition Provisions in the Telecommunications Act of 1996; Developing a Unified Inter-carrier Compensation Regime; Inter-carrier Compensation for ISP-Bound Traffic; IP-Enabled Services*; WC Docket No. 05-337; CC Docket No. 96-45; WC Docket No. 03-109; WC Docket No. 06-122; CC Docket No. 99-200; CC Docket No. 96-98; CC Docket No. 01-92; CC Docket No. 99-68; WC Docket No. 04-36; *Order on Remand and Report and Order and Further Notice of Proposed Rulemaking*, FCC 08-262 (rel. Nov. 5, 2008) (November 2008 Order).

²⁰ *Id.*, ¶243-260.

²¹ *In the Matter of High-Cost Universal Service Support; Federal-State Joint Board on Universal Service; Alltel Communications, Inc., et al. Petitions for Designation as Eligible Telecommunications Carriers; RCC Minnesota, Inc. and RCC Atlantic, Inc. New Hampshire ETC Designation Amendment*, WC Docket No. 05-337; CC Docket No. 96-45; *Order* (rel. May 1, 2008).

²² November 2011 Order, ¶ 29.

²³ *Id.*, ¶ 498 - 511.

ETC support will stop if Mobility Fund Phase II is not operational by June 30, 2014, ensuring approximately \$600 million per year in legacy support will continue to flow until the new mechanism is operational.”

ANALYSIS:

At the time the Commission addressed the primary line approach in Docket 99-326, the ILECs were the only carriers receiving KUSF support.²⁴ Residential customers tended to have, at most, three lines in service: the primary line, a second line, and a line for Internet service. Both single-line and multi-line business customer lines were supported.

To keep up with the changes in the industry, the Commission has adopted various modifications to the KUSF over the years. First, the Commission has defined a line that qualifies for KUSF support as a “revenue producing access line, or functionally equivalent, over which universal service is provided and meets the Commission’s definition of a supported line.”²⁵

When the Commission previously addressed the primary line issue, customers did not have access to the same number, or type, of service providers that are available today. Eleven competitive ETCs are currently eligible to receive KUSF support, including one cable company; five wire line carriers; and five wireless carriers. Three of these competitive ETCs, Big River Telephone, S&T Communications, and Wildflower Communications, have not requested and are not receiving KUSF support.

Households and businesses often subscribe to more than one service provider and many have more than one wireless line, increasing the KUSF support provided to carriers to provide service to multiple subscribers in one household or a business.

Preliminary Analysis of Primary Line Approach

To determine the number of lines, households and businesses that may be impacted, Staff selected a sample of the competitive ETCs currently receiving support and reviewed the most recent data submitted by those companies. The companies selected were H&B Cable, Sage, and Viaero.

The three companies sampled currently receive a total of \$313,775 of annual KUSF support for approximately 792 residential household and business lines. In total, 36 businesses receive support for 57 lines and 517 households receive KUSF support for 672 lines. Staff notes that this preliminary analysis indicated that in some cases, more than one business or possibly household, had the same address, as some addresses were not distinguished by apartment or suite numbers.

In comparison, if KUSF support is limited to one line per household or business address, the annual KUSF support paid to these three companies would decline approximately \$64,600, to \$249,200. This reduction is the result of providing KUSF support to 553 households and businesses instead of providing KUSF support for 792 lines, as shown in Table 1:

²⁴ Sprint Spectrum, LLC and GCC License Corporation had filed Petitions to be designated as Eligible Telecommunications Carriers for Federal Universal Service and KUSF purposes in Docket Nos. 99-SSLC-173-ETC and 99-GCCZ-156-ETC, respectively.

²⁵ Docket 10-667, September 2010, Order.

Table 1: Number of Households and Businesses

	1 Line	2 Lines	3 Lines	4 or more Lines	Total
Residential	422	58	21	16	517
Business	15	14	6	1	36
Total	437	72	27	17	553
Percent Total	79.0%	13.0%	5.0%	3.0%	100%

Due to time and resource constraints, this analysis was limited to reviewing the number of multiple lines per household or business by carrier. It did not include an analysis of customers that potentially subscribe to KUSF-supported service from more than one provider. Thus, the impact of restricting KUSF support to only one line per household or business and limiting that support to only one provider may actually be much greater than the results of this sampling.

Staff notes that for business lines, any line that terminates in a Private Branch Exchange (PBX), Centrex, or other hunt-group do not qualify for KUSF support.²⁶ To ensure this policy was technologically-neutral, the Commission found that if a business has four or more lines at the same billing address, those lines are similar to a hunt-group wire line and do not qualify for KUSF support.

Staff believes it would be appropriate to re-evaluate this issue at this time. Staff's review of the comments and reply comments filed in Docket 99-326 shows that the parties supported varying positions regarding whether the KUSF should support only one line per household or business or whether the amount of KUSF support available in an area should be capped, with all carriers serving in that area sharing the available KUSF support. The parties also focused on the administrative difficulties and implementation costs associated with a primary line policy.

The Commission will need to consider state and federal laws and regulations as they relate to a primary line policy, including its authority to limit KUSF support to the primary line and cap the amount of KUSF support available to competitive ETCs. A legal analysis of federal and state statutes, court interpretations, and Commission Orders may need to be performed. For example, K.S.A. 2011 Supp. 66-2008(b), states in part, "Pursuant to the federal act, distributions from the KUSF shall be made in a competitively neutral manner." The FCC is eliminating the Federal USF support for competitive ETCs over a five-year period.

RECOMMENDATION:

Staff recommends that the Commission open a separate proceeding to address: (1) whether, and how, to implement a primary line policy for KUSF support purposes; (2) whether the identical support or equal payment policy should be modified for competitive ETCs; and (3) other issues related to supplemental KUSF support. Staff recommends that the Commission request

²⁶ Docket 10-667, September 24, 2010, Order, ¶ 9.

comments and reply comments from the parties to the proceeding and that the comments address, at a minimum:

1. Should KUSF support be limited to one-line, per customer (household or business), per carrier, or alternatively, be limited to one-line, per customer.
2. Could KUSF support be capped at an amount for a service area (or even the wire center or zone level in AT&T and CenturyLink service areas) and allocated between providers eligible for KUSF support in that area?
3. If more than one business or household has the same address, how would the primary line be identified? Alternatively, should only one line be supported per address, regardless of the number of businesses or households at the same address?
4. What administrative steps, costs, and benefits, may be associated with each approach?
5. Do any Kansas statutes need to be modified for the Commission to implement a primary line approach?
6. In consideration of the FCC's decision to eliminate Federal USF support for competitive ETCs, should the Commission take similar steps with regard to the KUSF?
7. Any other items that the parties may believe are relevant to the payment of supplemental KUSF support related to access line growth?

cc: Patrice Petersen-Klein, Executive Director
Jeff McClanahan, Director of Utilities
Christine Aarnes, Chief of Telecommunications

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TRACI ROMEDY CABLE AND WIRELESS AMERICAS OPERATIONS INC. 20110 ASHBROOK PLACE STE 170 ASHBURN, VA 20147		
CLARENCE MATLOCK CABLE ONE INC. 2229 BROADWAY AVE PARSONS, KS 67357-2743		
REGULATORY & GOVERNMENTAL AFFAIRS CABLE ONE, INC. 1314 NORTH THIRD STREET PHOENIX, AZ 85004		
BILL REPPART JR, PRESIDENT CABLEVISION, LTD. D/B/A ST PAGING PO BOX 199 DODGE CITY, KS 67801		
PATRICK CONROY CALLFINITY 300 STATE ST STE 100 ROCHESTER, NY 14614-1047		

ORDER MAILED OCT 26 2012

The Docket Room hereby certified that on this _____ day of _____, 20_____, it caused a true and correct copy of the attached ORDER to be deposited in the United States Mail, postage prepaid, and addressed to the above persons.

PLEASE FORWARD THE ATTACHED DOCUMENT (S) ISSUED IN THE ABOVE-REFERENCED DOCKET TO THE FOLLOWING:

NAME AND ADDRESS	NO. CERT. COPIES	NO. PLAIN COPIES
<p>JAMES F. LEDNICKY CARSON COMMUNICATIONS, L.L.C. D/B/A RAINBOW COMMUNICATIONS 608 MAIN STREET PO BOX 147 EVEREST, KS 66424</p>		
<p>DAVID CONDIT, PRESIDENT CAUSE BASED COMMERCE INCORPORATED D/B/A THE SIENNA GROUP 8111 CHEVIOT RD STE 102 CINCINNATI, OH 45247-4013</p>		
<p>CHRIS NOTTOLI CCI NETWORK SERVICES, LLC 155 N 400 W STE 100 SALT LAKE CITY, UT 84103-1135</p>		
<p>DEBORAH KUHN, ASSISTANT GENERAL COUNSEL CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS 205 N MICHIGAN AVE 7TH FLR CHICAGO, IL 60601</p>		
<p>KATHY KUNC, ATTORNEY AT LAW CELLULAR NETWORK PARTNERSHIP D/B/A PIONEER CELLULAR RON COMINGDEER & ASSOCIATES 6011 N ROBINSON OKLAHOMA CITY, OK 73118</p>		
<p>MICHAEL A. PIERCE, WIRELESS MANAGER CELLULAR NETWORK PARTNERSHIP D/B/A PIONEER CELLULAR RON COMINGDEER & ASSOCIATES 6011 N ROBINSON OKLAHOMA CITY, OK 73118</p>		
<p>MIKE DUKE, DIR. OF GOV. AFFAIRS CENTURYTEL ACQUISITION LLC D/B/A CENTURYLINK ACQUISITION C/O TAX DEPT 100 CENTURYTEL DR MONROE, LA 71203</p>		

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NAME AND ADDRESS	NO. CERT. COPIES	NO. PLAIN COPIES
RON JOHNSON, CARRIER RELATIONS MGR CENTURYTEL ACQUISITION LLC D/B/A CENTURYLINK ACQUISITION PO BOX 1537 SULFUR SPRINGS, TX 75483-1537		
STACEY W. GOFF, VP ASST. GEN. COUNSEL CENTURYTEL FIBER COMPANY II, LLC D/B/A LIGHTCORE, A CENTURYTEL COMPANY 100 CENTURYTEL DRIVE MONROE, LA 71203		
SCOTT SANDERS, SR. ACCOUNTANT - TAX/REGULATORY CENTURYTEL FIBER COMPANY II, LLC D/B/A LIGHTCORE, A CENTURYTEL COMPANY 11111 DORSETT MARYLAND HEIGHTS, MO 63043		
CHANTEL MOSBY, MANAGER, TARIFFS & COMPLIANCE CENTURYTEL LONG DISTANCE, LLC 100 CENTURYTEL DRIVE MONROE, LA 71203		
JERALD KENT CEQUEL COMMUNICATIONS, INC. D/B/A SUDDENLINK COMMUNICATIONS, LLC 12444 POWERSCOURT DR STE 140 ST. LOUIS, MO 63131		
BETTY J. SANDERS CHARTER FIBERLINK KS - CCO, LLC 12405 POWERSCOURT DR ST. LOUIS, MO 63131-3674		
JOHN HENNESY CHIT CHAT 724 E LINCOLN ST WICHITA, KS 67211		
LARRY BARNES, DIRECTOR-REGULATORY AFFAIRS CINCINNATI BELL ANY DISTANCE INC. 221 E FOURTH ST ROOM 103-1170 CINCINNATI, OH 45202		

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NAME AND ADDRESS	NO. CERT. COPIES	NO. PLAIN COPIES
SCOTT RINGO, DIRECTOR REG. AFFAIRS CINCINNATI BELL ANY DISTANCE INC. 221 E FOURTH ST ROOM 1280 CINCINNATI, OH 45201		
CHRISTINE DYE CITRIX ONLINE CONFERENCE SERVICES GROUP, LLC 499 WASHINGTON BLVD STE 1401 JERSEY CITY, NJ 07310-2116		
JAMES MANCUSO, SECY. & GEN. COUNSEL CLEAR WORLD COMMUNICATIONS CORPORATION 3501 S HARBOR BLVD STE 200 SANTA ANA, CA 92704-6940		
BIJAN MOAVENI, PRESIDENT COAST INTERNATIONAL, INC. 14303 W 95TH ST LENEXA, KS 66215-5210		
DAVID E. PRICE COAST TO COAST CELLULAR INC. 1910 MINNO DR STE 210 JOHNSTOWN, PA 15905-1142		
PATRICIA CARROLL, GENERAL MANAGER COLUMBUS TELEPHONE CO. INC. 224 S KANSAS AVE COLUMBUS, KS 66725		
KARLY B. WERNER, SR. MANAGER GOVERNMENT AFFAIRS COMCAST PHONE OF KANSAS LLC D/B/A COMCAST DIGITAL PHONE 10 RIVER PARK PLAZA ST. PAUL, MN 55107		
KRISTOPHER TWOMEY, REGULATORY COUNSEL COMMPARTNERS, LLC 8350 S DURANGO DRIVE STE 220 LAS VEGAS, NV 89113		
ATTN: PRESIDENT COMMUNICATIONS NETWORK BILLING, INC. STE 301 (BOSS) 300 MAPLE PARK BLVD ST CLAIR SHORES, MI 48081-2217		

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NAME AND ADDRESS	NO. CERT. COPIES	NO. PLAIN COPIES
RICHARD GDOVIC COMSOFT CORPORATION 100 N CONSTITUTION DR STE 2 YORKTOWN, VA 23692-2792		
MICHAEL BRADY, VICE-PRESIDENT FINANCE COMTECH 21, LLC ONE BARNES PARK SOUTH WALLINGFORD, CT 06492		
ATTN: REGULATORY DEPARTMENT COMTECH 21, LLC ONE BARNES PARK SOUTH WALLINGFORD, CT 06492		
CHRIS MELTON, DIRECTOR OF OPERATIONS CONEXIONS LLC D/B/A CONEXION WIRELESS PO BOX 1358 MELBOURNE, FL 32902-1358		
TROY GUILLETT, CEO CONNECT INSURED TELEPHONE INC. D/B/A CONNECT IT 21175 TOMBALL PKWY STE 413 HOUSTON, TX 77070		
TROY GUILLETT, CEO CONNECT INSURED TELEPHONE INC. D/B/A CONNECT IT 21175 TOMBALL PKWY STE 413 HOUSTON, TX 77070		
BILL TERRY, REGULATORY CONSOLIDATED COMMUNICATIONS ENTERPRISE SERVICES, IN 350 SOUTH LOOP 336 WEST CONROE, TX 77304		
JILL LEONETTI CONSUMER CELLULAR, INC. 7204 SW DURHAM RD STE 300 PORTLAND, OR 97224-7574		

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NAME AND ADDRESS	NO. CERT. COPIES	NO. PLAIN COPIES
JOSEPH NICOTRA, PRESIDENT CONSUMER TELCOM, INC. STE 200 701 N GREEN VALLEY PARKWAY HENDERSON, NV 89014		
MARGARETE LYONS CONTACT CONFERENCE SERVICES, INC. 5 HAP TERRACE DANFILLE, CA 94506		
JOHN LAPENTA CONTERRA ULTRA BROADBAND, LLC 2101 REXFORD ROAD, SUITE 200 CHARLOTTE, NC 28211		
CLIFF REES, PRESIDENT CONVERGIA, INC. 237 HYMUS BOULEVARD POINTE CLAIRE, QC H9R 5C7		
NICK BUNCH, REGULATORY ANALYST CONVERSANT TECHNOLOGIES, INC. PO BOX 2868 MOBILE, AL 36652-2868		
KEN GRIFFO CORDIAIP CORP. 222 PURCHASE STREET # 206 RYE, NY 10580		
CHRIS VAN DE VERG, GENERAL COUNSEL CORETEL KANSAS, INC. 209 WEST STREET STE 302 ANNAPOLIS, MD 22401		
DALE JONES, GENERAL MANAGER COUNCIL GROVE TELEPHONE COMPANY PO BOX 299 COUNCIL GROVE, KS 66846		
TONY BARRETT, VP OF OPERATIONS COVISTA, INC. 4289 BONNY OAKS DR STE 102 CHATTANOOGA, TN 37406-1600		

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NAME AND ADDRESS	NO. CERT. COPIES	NO. PLAIN COPIES
THOMAS P. GUNNING COVISTA, INC. 4289 BONNY OAKS DR STE 102 CHATTANOOGA, TN 37406-1600		
CURT STAMP, DIRECTOR REGULATORY AFFAIRS - OK/KS/AR COX COMMUNICATIONS, INC. 6301 WATERFORD BLVD STE 200 OKLAHOMA CITY, OK 73118		
CURT STAMP, DIRECTOR REGULATORY AFFAIRS - OK/KS/AR COX KANSAS TELCOM, L.L.C. D/B/A COX COMMUNICATIONS, INC 6301 WATERFORD BLVD STE 200 OKLAHOMA CITY, OK 73118-1161		
JERRY JAMES, GENERAL MANAGER CRAW-KAN TELEPHONE COOPERATIVE, INC. 200 N OZARK PO BOX 100 GIRARD, KS 66743		
CRAIG WILBERT, GENERAL MANAGER CRAW-KAN TELEPHONE COOPERATIVE, INC. 200 N OZARK PO BOX 100 GIRARD, KS 66743		
JEFF KORN, CHIEF LEGAL OFFICER CREXENDO BUSINESS SOLUTIONS, INC. 1615 S 52ND ST TEMPE, AZ 85281-6233		
PATRICK SHIPLEY, DIR OF GOVERNMENT AFFAIRS CRICKET COMMUNICATIONS, INC. C/O LEAP WIRELESS 5887 COPLEY DRIVE SAN DIEGO, CA 92111-7906		
BILL SMITH, CORPORATE RELATIONS SUPERVISOR CRICKET COMMUNICATIONS, INC. 6380 SOUTH FIDDLERS GREEN CIRCLE GREENWOOD VILLAGE, CO 80111		

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NAME AND ADDRESS	NO. CERT. COPIES	NO. PLAIN COPIES
PAMELA L. HINTZ, VP LEGAL & REGULATORY AFFAIRS CTC COMMUNICATIONS CORP. D/B/A EARTHLINK BUSINESS ONE COMMUNICATIONS FIVE WALL STREET BURLINGTON, MA 01803		
DAVID B. CUNNINGHAM, PRESIDENT CUNNINGHAM COMMUNICATIONS, INC. 220 W MAIN PO BOX 108 GLEN ELDER, KS 67446		
BRENT CUNNINGHAM, VICE PRESIDENT & GENERAL MANAGER CUNNINGHAM TELEPHONE COMPANY, INC. 220 W MAIN PO BOX 108 GLEN ELDER, KS 67446		
DAVID BARKSDALE CUSTOM TELECONNECT, INC 6242 W DESERT INN RD LAS VEGAS, NV 89146-6612		
PATRICK D. CROCKER DCT TELECOM GROUP, INC. 107 W MICHIGAN AVE STE 400 KALAMAZOO, MI 49007		
PAULA FOLEY, REGULATORY AFFAIRS COUNSEL DELTACOM, INC. 5 WALL STREET BURLINGTON, MA 01803		
PETER FRIEDMAN DELTATHREE, INC. D/B/A ICONNECTHERE 117 CENTRAL AVE STE 2 HACKENSACK, NJ 07601-4268		
GREG W. SCHNEIDER, PRESIDENT DIGIZIP.COM, INC. SOUNDVIEW PLACE 1266 E MAIN ST STE 700 STAMFORD, CT 06902		

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NAME AND ADDRESS	NO. CERT. COPIES	NO. PLAIN COPIES
CHRISTINA NEHER, COMMISSION/INDUSTRY RELATIONS DISHNET WIRELINE L.L.C. 9601 S MERIDIAN BLVD ENGLEWOOD, CO 80112		
GEORGE CONNETT, MANAGER, COMPLAINTS DPI-TELECONNECT, L.L.C. 1330 CAPITAL PKWY CARROLLTON, TX 75006-3647		
DAVID DORWART, PRESIDENT/CEO DPI-TELECONNECT, L.L.C. 1330 CAPITAL PKWY CARROLLTON, TX 75006-3647		
KURT DAVID, CFO EAGLE COMMUNICATIONS, INC. 2703 HALL STE 15 PO BOX 817 HAYS, KS 67601		
PINKYE NEAL EARTHLINK, INC. 1375 PEACHTREE ST LEVEL A ATLANTA, GA 30309		
ROBERT MOCAS, PRESIDENT EASTON TELECOM SERVICES, L.L.C. SUMMIT II UNIT A 3046 BRECKSVILLE ROAD RICHFIELD, OH 44286		
JOSEPH A. FERNANDEZ, CEO EASY TELEPHONE SERVICES COMPANY D/B/A EASY WIRELESS 4477 RAINBOW AVE WESTON, FL 33332-2477		
MARC HAWK ECR VOICE, LLC PO BOX 511 MT VERNON, OH 43050		

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NAME AND ADDRESS	NO. CERT. COPIES	NO. PLAIN COPIES
DALE PERRY ELECTRIC LIGHTWAVE, LLC D/B/A INTEGRA TELECOM GOVERNMENT AFFAIRS DEPARTMENT 1201 NE LLOYD BLVD PORTLAND, OR 97232-1259		
BOB BOALDIN, PRESIDENT & GENERAL MANAGER ELKHART TELEPHONE COMPANY, INC. 610 SOUTH COSMOS PO BOX 817 ELKHART, KS 67950		
MARK HARPER, STATE REGULATORY EMBARQ COMMUNICATIONS, INC. D/B/A CENTURYLINK COMMUNICATIONS 5454 W 110TH ST OVERLAND PARK, KS 66211-1204		
JOHN R. IDOUX, STATE DIRECTOR REGULATORY AFFAIRS EMBARQ COMMUNICATIONS, INC. D/B/A CENTURYLINK COMMUNICATIONS KSOPKJ0401 5454 W 110TH ST OVERLAND PARK, KS 66211		
KELLY WALTERS, VICE-PRESIDENT EMPIRE DISTRICT INDUSTRIES, INC. 602 JOPLIN PO BOX 127 JOPLIN, MO 64802-0127		
JEFFREY M. ZINDEL, PRESIDENT & COO ENCARTELE, INC. PO BOX 540547 OMAHA, NE 68154		
CARLA DIMOND, PROJECT & PROCESS COORDINATOR ENHANCED COMMUNICATIONS GROUP, L.L.C. D/B/A ECG 312 SE DELAWARE AVE BARTLESVILLE, OK 74003-3630		

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NAME AND ADDRESS	NO. CERT. COPIES	NO. PLAIN COPIES
BRUCE SUMMERS, CEO ENHANCED COMMUNICATIONS GROUP, L.L.C. D/B/A ECG 312 SE DELAWARE AVE BARTLESVILLE, OK 74003-3630		
CHRISTOPHER RICCA, PRESIDENT ENHANCED COMMUNICATIONS NETWORK, INC. 1031 SOUTH GLENDORA AVENUE WEST COVINA, CA 91790		
DAVID GIBSON, VP OF OPERATIONS ENTELEGENT SOLUTIONS, INC. 3800 ARCO CORPORATE DR STE 310 CHARLOTTE, NC 28273		
MORRIS LICHTENSTE, PRESIDENT ENTRIX TELECOM, INC. 1430 BROADWAY STE 1615 NEW YORK, NY 10018		
BOB BOALDIN, PRESIDENT EPIC TOUCH CO. 610 S COSMOS PO BOX 1260 ELKHART, KS 67950-1260		
TRENT BOALDIN, PRESIDENT EPIC TOUCH CO. 610 S COSMOS PO BOX 1260 ELKHART, KS 67950-1260		
JOHN CARROLL EQUINOIX INC. 3922 BRINTONS ML MARIETTA, GA 30062-6002		
PAUL MASTERS, PRESIDENT ERNEST COMMUNICATIONS, INC. 5275 TRIANGLE PARKWAY STE 150 NORCROSS, GA 30092		

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NAME AND ADDRESS	NO. CERT. COPIES	NO. PLAIN COPIES
STEVE REYNOLDS, PROVISIONING MGR ERNEST COMMUNICATIONS, INC. 5275 TRIANGLE PARKWAY STE 150 NORCROSS, GA 30092		
JULIE RICHARDSON EVOLVE BUSINESS SOLUTIONS, LLC 221 E FOURTH ST RM 103-1170 CINCINNATI, OH 45202		
RACHELLE COPELAND, SECRETARY EZ REACH MOBILE, LLC 3955 PLEASANTDALE RD STE 104 ATLANTA, GA 30340		
ATTN: EXECUTIVE DIRECTOR FAIRPOINT BROADBAND, INC. D/B/A RURALLINK 521 E MOREHEAD STREET STE 250 CHARLOTTE, NC 28202		
KAY KING FAIRPOINT CARRIER SERVICES, INC. 908 WEST FRONTVIEW PO BOX 199 DODGE CITY, KS 67801		
PATRICK L. MORSE, SR VP - GOV AFFAIRS FAIRPOINT COMMUNICATIONS MISSOURI, INC. 908 WEST FRONTVIEW PO BOX 199 DODGE CITY, KS 67801		
GERMAINE BORDAGARAY FIONDA VOIP, LLC 2029 VILLAGE LN STE 101 SOLVANG, CA 93463-2275		
HAYRI BARUTCU FIREFLY MOBILE COMMUNICATIONS, INC. 1880 NW 97TH AVE MIAMI, FL 33172		

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NAME AND ADDRESS	NO. CERT. COPIES	NO. PLAIN COPIES
SCOTT HOWSARE, PRESIDENT FIRST CHOICE TECHNOLOGY, INC. 903 LAKE LILY DR APT A125 MAITLAND, FL 32751		
MARY CEGELSKI, MANAGER OF REGULATORY AFFAIRS FIRST COMMUNICATIONS, LLC 3340 W MARKET ST FAIRLAWN, OH 44333-3306		
MICHAEL CROWN FRACTEL LLC 1300 PINE TREE DR #12 INDIAN HARBOR BEACH, FL 32937		
JOE TOPEL, REGULATORY MANAGER FRANCE TELECOM CORPORATE SOLUTIONS L.L.C. MAILSTOP 1100 13775 MCLEAREN ROAD OAK HILL, VA 20171		
REGULATORY & GOVERNMENTAL AFFAIRS FRANK COMMUNICATIONS 115 W 35TH HAYS, KS 67601-3341		
LESLIE ZINK, MANAGER - PRICING & TARIFFS FRONTIER COMMUNICATIONS OF AMERICA, INC. 3 HIGH RIDGE PARK STAMFORD, CT 06905-1337		
BOB INGRAM FULL SPECTRUM COMMUNICATIONS, INC. 17175 ICOT BLVD STE 100 CLEARWATER, FL 33760		
REGULATORY & GOVERNMENTAL AFFAIRS GATEWAY WIRELESS 121 S LULU ST WICHITA, KS 67211-1710		
BEAU REBEL, GENERAL MANAGER GBT COMMUNICATIONS, INC. 103 LINCOLN PO BOX 229 RUSH CENTER, KS 67575		

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NAME AND ADDRESS	NO. CERT. COPIES	NO. PLAIN COPIES
GAVIN MCCARTY, GENERAL COUNSEL GC PIVOTAL, LLC 180 N LA SALLE ST STE 2430 CHICAGO, IL 60601-2704		
FRANCIS NAJAFI GC PIVOTAL, LLC 180 N LA SALLE ST STE 2430 CHICAGO, IL 60601-2704		
GENE MORRIS, CHIEF EXECUTIVE OFFICER GIANT COMMUNICATIONS, INC. 418 W 5TH STREET STE B HOLTON, KS 66436		
GINGER WASHBURN GIT SATELLITE COMMUNICATIONS 13740 N HIGHWAY 183 STE Q1 AUSTIN, TX 78750-1835		
DAVID SKOGEN, PRESIDENT/CEO GLOBAL CONNECTION INC. OF AMERICA 5555 OAKBROOK PARKWAY STE 620 NORCROSS, GA 30093		
DIANE PETERS, DIRECTOR OF REGULATORY GLOBAL CROSSING LOCAL SERVICES, INC. LEVEL 3 COMMUNICATIONS, LLC 1025 ELDORADO BLVD BROOMFIELD, CO 80021		
DIANE PETERS, DIRECTOR OF REGULATORY GLOBAL CROSSING NORTH AMERICAN NETWORKS, INC. 225 KENNETH DR ROCHESTER, NY 14623		
DIANE PETERS, DIRECTOR OF REGULATORY GLOBAL CROSSING TELECOMMUNICATIONS, INC. LEVEL 3 COMMUNICATIONS, LLC 1025 ELDORADO BLVD BROOMFIELD, CO 80021		

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NAME AND ADDRESS	NO. CERT. COPIES	NO. PLAIN COPIES
SHEILA KIGHT GLOBAL TEL LONG DISTANCE, INC. D/B/A AMERICAN ROAMING NETWORK 7999 N FEDERAL HIGHWAY 4TH FLOOR BOCA RATON, FL 33487		
CRAIG R. FERGUSON, PRESIDENT GLOBAL TEL*LINK CORPORATION 12021 SUNSET HILLS RD STE 100 RESTON, VA 20190		
JOHN T. SHAVE, PRESIDENT GLOBALCOM, INC. 3340 WEST MARKET STREET AKRON, OH 44333		
SWEE GONG GLOBALSTAR USA, LLC 461 S MILPITAS BLVD MILPITAS, CA 95035-5438		
BRUCE H. BENNETT, CHIEF EXECUTIVE OFFICER/PRESIDENT GO SOLO TECHNOLOGIES, INC. 10701 DANKA WAY N STE 100 SAINT PETERSBURG, FL 33716-3713		
ATA MOEINI, PRESIDENT GOLD LINE TELEMAGEMENT INC. 180 WEST BEAVER CREEK ROAD CANADA RICHMOND HILL, ON L4B 1B4		
CARMINE TUCCI GOLD LINE TELEMAGEMENT INC. 180 WEST BEAVER CREEK ROAD CANADA RICHMOND HILL, ON L4B 1B4		
BEAU REBEL, GENERAL MANAGER GOLDEN BELT TELEPHONE ASSOCIATION. 103 LINCOLN ST PO BOX 229 RUSH CENTER, KS 67575		

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NAME AND ADDRESS	NO. CERT. COPIES	NO. PLAIN COPIES
MICHAEL J. MURPHY, PRESIDENT & MANAGER GORHAM TELEPHONE COMPANY 100 MARKET PO BOX 235 GORHAM, KS 67640		
ROBERT T. HALE JR, PRESIDENT GRANITE TELECOMMUNICATIONS, LLC 100 NEWPORT AVE EXT #1 QUINCY, MA 02171-1734		
CHUCK SCHEIWE GREATCALL, INC. 12680 HIGH BLUFF DR STE 310 SAN DIEGO, CA 92130-2004		
Dennis Henderson, CEO H H VENTURES, LLC D/B/A READY MOBILE 955 Kacena Road Ste A Hiawatha, IA 52233		
ROBERT A. KOCH, PRESIDENT/GEN MGR H&B CABLE SERVICE, INC. 108 NORTH MAIN PO BOX 108 HOLYROOD, KS 67450		
ROBERT A. KOCH, PRESIDENT/GEN MGR H&B COMMUNICATIONS, INC. 108 NORTH MAIN PO BOX 108 HOLYROOD, KS 67450		
CAROLYN MALONE HALO WIRELESS INC 3437 W 7TH ST, BOX 127 FORT WORTH, TX 76107		
REGULATORY & GOVERNMENTAL AFFAIRS HAUG COMMUNICATIONS E HIGHWAY 36 RR 3 BOX 9 SENECA, KS 66538-0009		

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NAME AND ADDRESS	NO. CERT. COPIES	NO. PLAIN COPIES
MARK WADE, GEN MANAGER HAVILAND TELEPHONE COMPANY, INC. 106 NORTH MAIN PO BOX 308 HAVILAND, KS 67059		
CHRISTOPHER L. OWEN HCI TELCOM INC. 266 N MAIN STREET STE 150 WICHITA, KS 67202		
CATHERINE MOYER, GENERAL MANAGER & CEO HIGH PLAINS TELECOMMUNICATIONS, INC. D/B/A PIONEER LONG DISTANCE 120 NORTH BAUGHMAN PO BOX 707 ULYSSES, KS 67880		
ROBERT BALDWIN, PRESIDENT HOME COMMUNICATIONS, INC. 211 SOUTH MAIN STREET GALVA, KS 67443		
CARLA SHEARER, PRESIDENT HOME TELEPHONE COMPANY, INC. 211 SOUTH MAIN BOX 8 GALVA, KS 67443		
JENNIFER DEPINTO, REGULATORY MANAGAER HORIZON TELECOM, INC. 3993 HOWARD HUGHES PKWY STE 250 LAS VEGAS, NV 89109		
JAMES MERTZ, VICE PRESIDENT - GOVERNMENT AFFAIRS HYPERCUBE TELECOM, LLC 3200 W PLEASANT RUN RD STE 300 LANCASTER, TX 75146-1086		
CASIMIR WOJCIECHOWSKI, PRESIDENT IBFA ACQUISITION COMPANY, LLC 10600 W HIGGINS RD STE 517 ROSEMONT, IL 60018-3719		

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NAME AND ADDRESS	NO. CERT. COPIES	NO. PLAIN COPIES
ARLO GILBERT ICALL, INC. 1505 FEDERAL ST STE 200 DALLAS, TX 75201-3488		
KEVIN MCLAUGHLIN GREENSFEL IDN COMMUNICATIONS, LLC 10 S BROADWAY STE 200 ST. LOUIS, MO 63102		
ANTHONY ACEVEDO, CUSTOMER SERVICE LEGAL LIAISON IDT AMERICA, CORP. 520 BROAD ST 14TH FLR NEWARK, NJ 07102-3111		
DIANE CLARK IDT AMERICA, CORP. 520 BROAD ST 14TH FLR NEWARK, NJ 07102-3111		
REGULATORY & GOVERNMENTAL AFFAIRS IDT TELECOM, INC. 520 BROAD ST NEWARK, NJ 07102		
PAUL JARMAN, PRESIDENT INCONTACT, INC. 7730 UNION PARK AVE STE 500 MIDVALE, UT 84047-5572		
KIMM PARTRIDGE, SECRETARY INCONTACT, INC. 7730 UNION PARK AVE STE 500 MIDVALE, UT 84047-5572		
RAYMOND COWLEY, SR. VICE PRESIDENT INETWORKSGROUP, INC. 125 S WACKER DR STE 2510 CHICAGO, IL 60606		
ALECIA MONROE, PARALEGAL/MANAGER, REGULATORY AFFAIRS INFOTELECOM, LLC 75 ERIEVIEW PLZ FL 4 CLEVELAND, OH 44114-1839		

ORDER MAILED OCT 26 2012

The Docket Room hereby certified that on this ___ day of _____, 20____, it caused a true and correct copy of the attached ORDER to be deposited in the United States Mail, postage prepaid, and addressed to the above persons.

PLEASE FORWARD THE ATTACHED DOCUMENT (S) ISSUED IN THE ABOVE-REFERENCED DOCKET TO THE FOLLOWING:

NAME AND ADDRESS	NO. CERT. COPIES	NO. PLAIN COPIES
COURTNEY GARRETT INFOTELIS CORPORATION D/B/A BROADVOX, VOIP.NET 1950 N STEMMONS FWY STE 3031 DALLAS, TX 75207-3182		
BRENDAN PHILBIN, CHIEF OPERATING OFFICER INMATE CALLING SOLUTIONS, LLC 2220 DANBURY SAN ANTONIO, TX 78217		
KOOI LIMM INPHONEX.COM, LLC 7206 NW 31ST ST MIAMI, FL 33122-1216		
PAMELA RIECK, REGULATORY MANAGER INTEGRATED SERVICES, INC. ONE NORTHBROOK PL STE 200 5 REVERE DR NORTHBROOK, IL 60062		
ANDRE SIMONE, VICE PRESIDENT INTELEPEER, INC. 2855 CAMPUS DR STE 200 SAN MATEO, CA 94403		
MARSHA POKORNY, MANAGER-REGULATORY COMPLIANCE INTELLICALL OPERATOR SERVICES, INC. 1049 NE MACEDONIA CHURCH AVE LEE, FL 32059-7419		
LORRAINE BOONE INTERCALL COMMUNICATIONS, INC. FKA SMOOTHSTONE IP CC 200 SMOOTHSTONE CENTER 401 S 4TH ST LOUISVILLE, LA 40202		
RAY HOUSE INTERFACE SECURITY SYSTEM HOLDINGS 3773 CORPORATE CENTER DR EARTH CITY, MO 63045		

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NAME AND ADDRESS	NO. CERT. COPIES	NO. PLAIN COPIES
REGULATORY & GOVERNMENTAL AFFAIRS INTERNATIONAL INFORMATION SYSTEMS GROUP 1015 VIRGINIA DR FT. WASHINGTON, PA 19034-3101		
LESLIE BEACH INTERNATIONAL TELCOM LTD. 417 2ND AVE WEST SEATTLE, WA 98119		
JOHN DWYER, CEO INTEROP TECHNOLOGIES, LLC 13500 Powers Court Ste 200 Fort Myers, FL 33912		
CINDY CLUGY, DIRECTOR-STATE REG. AFFAIRS INTRADO COMMUNICATIONS, INC. 1601 DRY CREEK ROAD LONGMONT, CO 80503		
DAVID A HUBERMAN, ASSISTANT GENERAL COUNSEL INTRADO COMMUNICATIONS, INC. 1601 DRY CREEK ROAD LONGMONT, CO 80503		
CHRISTOPHER BUNCE, VP, LEGAL & GEN COUNSEL IONEX COMMUNICATIONS, INC. 2300 MAIN STREET STE 340 KANSAS CITY, MO 64108-2415		
FRANK O'KANE IP NETWORKED SERVICES INC. 1950 HASSELL RD HOFFMAN ESTATES, IL 60169-6308		
BILL BURGE ITALK GLOBAL COMMUNICATIONS D/B/A ITALKBB 1122 S CAPITAL OF TEXAS HWY STE 375 WEST LAKE HILLS, TX 78746-6750		
PAUL MCALEESE, CHIEF EXECUTIVE OFFICER I-WIRELESS, LLC 1 LEVEE WAY, SUITE 3104 NEW PORT, KY 41071-1661		

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NAME AND ADDRESS	NO. CERT. COPIES	NO. PLAIN COPIES
PATRICK MCDONOUGH, VICE PRESIDENT I-WIRELESS, LLC 1 LEVEE WAY STE 3104 NEWPORT, KY 41071-1661		
GENE MORRIS, PRESIDENT/GENERAL MGR. J.B.N. TELEPHONE COMPANY, INC. PO BOX 111 HOLTON, KS 66436		
GENE MORRIS, MANAGER J.B.N. TELEPHONE COMPANY, INC. PO BOX 111 HOLTON, KS 66436		
BRENT THOMSON JIVE COMMUNICATIONS, INC. 1275 W 1600 N OREM, UT 84057-2428		
DANIEL NEAL KAJEET, INC. 7101 WISCONSIN AVE STE 1111 P.O. BOX 30804 BETHESDA, MD 20814-4837		
DAVE LOWE, PRESIDENT KANOKLA COMMUNICATIONS, INC. PO BOX 111 100 KANOKLA AVENUE CALDWELL, KS 67022-0111		
GREG ALDRIDGE, CEO/GENERAL MANAGER KANOKLA TELEPHONE ASSN., INC. 100 KANOKLA AVENUE PO BOX 111 CALDWELL, KS 67022		
STEPHANIE CASSIOPPI, LEGAL AND REGULATORY AFFAIRS KANSAS #15 LIMITED PARTNERSHIP 8410 BRYN MAWR SUITE 700 CHICAGO, IL 60631		

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NAME AND ADDRESS	NO. CERT. COPIES	NO. PLAIN COPIES
JIMMY TODD, BOARD MEMBER KANSAS FIBER NETWORK LLC 121 N MEAD ST STE 200 WICHITA, KS 67202-2747		
PATRICK D. CROCKER, ATTORNEY KDDI AMERICA, INC. 825 THIRD AVE 3RD FLR NEW YORK, NY 10022		
MONTY GILLIAM, GEN. MANAGER KITNET, L.L.C. 645 E IRON AVENUE SUITE C SALINA, KS 67401		
PATRICK KNORR, GENERAL MANAGER KNOLOGY THE WORLD COMPANY 644 NEW HAMPSHIRE P.O. BOX 808 LAWRENCE, KS 66044		
BRUCE SCHOONOVER, DIRECTOR REGULATORY AFFAIRS KNOLOGY OF KANSAS, INC. D/B/A KNOLOGY 1241 O.G. SKINNER DR WEST POINT, GA 31833		
EMRE KOSMAZ KOSMAZ TECHNOLOGIES, LLC D/B/A VOIPVOIP, KOMTURK 1201 ALTA VISTA DR #202 WALNUT CREEK, CA 94596-4630		
J. CHRIS CARIKER, GENERAL MANAGER K-POWERNET, L.L.C. 500 S KAMO DR VINITA, OK 74301-4613		
HARRY J. LEE, JR., PRESIDENT/GENERAL MANAGER LAHARPE TELEPHONE COMPANY, INC. D/B/A LAHARPE LONG DISTANCE 109 W. 6TH STREET PO BOX 100 LA HARPE, KS 66751		

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NAME AND ADDRESS	NO. CERT. COPIES	NO. PLAIN COPIES
TERRY WHITESIDE LATTICE INCORPORATED 7150 N PARK DR STE 500 PENNSAUKEN, NJ 08109-4203		
MARTIN J. TIBBITTS LCR TELECOMMUNICATIONS, LLC 100 W BIG BEAVER RD STE 200 TROY, MI 48084		
CURTIS BROWN, PRESIDENT LEGACY LONG DISTANCE INTERNATIONAL, INC. 10833 VALLEY VIEW ST STE 150 CYPRESS, CA 90630		
SCOTT WHITE, PRESIDENT LEGENT COMMUNICATIONS CORPORATION D/B/A LONG DISTANCE AMERICA 15615 ALTON PKWY STE 245 IRVINE, CA 92618-7312		
GREG T DIAMOND, CORPORATE COUNSEL-REGULATORY LEVEL 3 COMMUNICATIONS, LLC 1505 5TH AVE STE 501 SEATTLE, WA 98101-1678		
JIM MASTERSON LIGHTEDGE SOLUTIONS INC. 215 10TH ST STE 1220 DES MOINES, IA 50309		
LINDA HUNT, DIR., LEGAL & REGULATORY AFFAIRS LIGHTYEAR NETWORK SOLUTIONS, LLC 1901 EASTPOINT PARKWAY LOUISVILLE, KY 40223		
LESTER KUCHAR LIVETV AIRPHONE, INC. 2809 BUTTERFIELD RD OAK BROOK, IL 59522		

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NAME AND ADDRESS	NO. CERT. COPIES	NO. PLAIN COPIES
RONALD HENRIKSEN, PRESIDENT LOGIX COMMUNICATIONS, LP 2950 NORTH LOOP W SUITE 1200 HOUSTON, TX 77092-8839		
HOWARD J. SIEGEL, VP OF EXTERNAL & REGULATORY AFFAIRS LOGIX COMMUNICATIONS, LP 210 BARTON SPRINGS ROAD, SUITE 100 AUSTIN, TX 78704		
THOMAS K CROWE, ATTORNEY LONG DISTANCE CONSOLIDATED BILLING CO. 20 W WASHINGTON ST SUITE 6A CLARKSTON, MI 48346		
JIMMY TODD, GENERAL MANAGER LR COMMUNICATIONS, INC. D/B/A MUTUAL TELECOMMUNICATIONS 365 MAIN STREET PO BOX 338 LITTLE RIVER, KS 67457		
SHERRY L. DEWITT, PRESIDENT MADISON TELEPHONE LLC 117 NORTH THIRD PO BOX 337 MADISON, KS 66860-0337		
MARY MEYER, CEO MADISON TELEPHONE LLC 117 NORTH THIRD PO BOX 337 MADISON, KS 66860-0337		
SCOTT KLOPACK, VP OF REGULATORY AFFAIRS AND GENERAL COUNSEL MATRIX TELECOM, INC. 433 E LAS COLINAS BLVD W STE 400 IRVING, TX 75039-5658		

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NAME AND ADDRESS	NO. CERT. COPIES	NO. PLAIN COPIES
CHARLES G. TAYLOR JR., PRESIDENT MATRIX TELECOM, INC. 433 E LAS COLINAS BLVD W STE 400 IRVING, TX 75039-5658		
ANNA SOKOLIN-MAIMON, VP REGULATORY AFFAIRS MCC TELEPHONY OF MIDWEST, LLC 100 CRYSTAL RUN ROAD MIDDLETOWN, NY 10941		
FRANCIS X. AHEARN, CEO MCGRAW COMMUNICATIONS, INC. 521 5TH AVE STE 14 NEW YORK, NY 10175		
DEBORAH KUHN, ASSISTANT GENERAL COUNSEL MCI COMMUNICATIONS SERVICES D/B/A VERIZON BUSINESS SERVICES 205 N MICHIGAN AVE 7TH FLR CHICAGO, IL 60601		
LYLE WILLIAMSON, DIRECTOR - STATE GOVERNMENT RELATIONS MCI COMMUNICATIONS SERVICES D/B/A VERIZON BUSINESS SERVICES 8350 E CRESCENT PKWY STE 200 GREENWOOD VILLAGE, CO 80111-2858		
HALEH DAVARY, REGULATORY ANALYST MCIMETRO ACCESS TRANSMISSION SERVICES LLC 201 SPEAR ST 7TH FLR SAN FRANCISCO, CA 94105		
WILLIAM HAAS, VP, DEPUTY GENERAL COUNSEL MCLEODUSA TELECOMMUNICATIONS SERVICES, LLC 1450 N CENTER POINT RD HIAWATHA, IA 52233-1232		
DAVE MACMILLIAM MEGAPATH 1201 WESTERN AVE 7TH FL SEATTLE, WA 98101		

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NAME AND ADDRESS	NO. CERT. COPIES	NO. PLAIN COPIES
KATHERINE K MUDGE, DIRECTOR, STATE AFFAIRS & ILEC RELATIONS MEGAPATH CORPORATON 4836 B KRAMER LN., STE. 100 AUSTIN, TX 95131		
MARSHALL ARONOW, CO-PRESIDENT METROPOLITAN TELECOMMUNICATIONS OF KANSAS, INC. D/B/A METTEL 55 WATER STREET 31ST FLOOR NEW YORK, NY 10041		
JERRY HOLT, PRESIDENT MIDWESTERN TELECOMMUNICATIONS, INC. D/B/A M.T.I. 15426 S 770TH CT ORLANDO PARK, IL 60462-5133		
ROBERT LANIER MINDSHIFT TECHNOLOGIES, INC. 307 WAVERLY OAKS RD WALTHAM, MA 02452		
MARK SORIA, CHIEF OPERATIONS OFFICER MIRACLE COMMUNICATIONS, INC. 725 LAKEFIELD ROAD, SUITE G WESTLAKE VILLAGE, CA 91361		
JON BRINTON, PRESIDENT MITEL NETSOLUTIONS, INC. 7300 W BOSTON ST CHANDLER, AZ 85226-3227		
LOUIE HOLMES MIX NETWORKS, INC. 608 ROBIN RD LAKELAND, FL 33803		
STEPHANIE CRUZ, EXECUTIVE ASSISTANT TO THE PRESIDENT MOBILITIE, LLC 660 NEWPORT CENTER DRIVE, SUITE 200 NEWPORT BEACH, CA 92660-5403		

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NAME AND ADDRESS	NO. CERT. COPIES	NO. PLAIN COPIES
GAIL LANDERS MOBILPAGE INC. 812 S 10TH ST ST JOSEPH, MO 64501		
JANE PRETTYMAN, GENERAL MANAGER MOKAN COMMUNICATIONS, INC. 112 S BROADWAY PO BOX 429 LOUISBURG, KS 66053		
DEBBIE NOBELS, VP REGULATORY AFFAIRS MOKAN DIAL, INC. 505 PLAZA CIRCLE SUITE 200 ORANGE PARK, FL 32073		
ALAN CREIGHTON, PRESIDENT, CEO MOMENTUM TELECOM, INC. 2700 CORPORATE DRIVE SUITE 200 BIRMINGHAM, AL 35242		
ROBERT MCALLISTER MONSTERTEL, INC. 731 S HGWY 101 STE 12 BOX 785 SOLANA BEACH, CA 92075		
HARRY WEELBORG, MANAGER MOUNDRIDGE TELCOM, INC. 109 NORTH CHRISTIAN AVENUE PO BOX 960 MOUNDRIDGE, KS 67107		
HARRY M WEELBORG, VICE PRESIDENT MOUNDRIDGE TELEPHONE COMPANY 109 NORTH CHRISTIAN AVENUE BOX 960 MOUNDRIDGE, KS 67107		
EVERARD KIDDER MEADE III, PRESIDENT MULTILINE LONG DISTANCE, INC. 8044 MONTGOMERY RD STE 700 CINCINNATI, OH 45236		

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NAME AND ADDRESS	NO. CERT. COPIES	NO. PLAIN COPIES
<p>JIMMY TODD, GENERAL MANAGER MUTUAL TELEPHONE COMPANY 365 MAIN STREET PO BOX 338 LITTLE RIVER, KS 67457</p>		
<p>J. ERIC ROSS, PRESIDENT SECRETARY & TREASURER NATIONAL ACCESS LONG DISTANCE, INC. 871 Coronado Center Drive, Suite 200 HENDERSON, NV 89052</p>		
<p>THOMAS F. SPEED JR, PRESIDENT, DIRECTOR NATIONAL DIRECTORY ASSISTANCE, LLC 12700 TOWNEPARK WAY LOUISVILLE, KY 40243</p>		
<p>ALICIA G. TREDER, REGULATORY AND COMPLIANCE MANAGER NATIONWIDE LONG DISTANCE SERVICE, INC. 2000 TOWN CENTER STE 1900 SOUTHFIELD, MI 48075</p>		
<p>MICHAEL MCALISTER, GENERAL COUNSEL NAVIGATOR TELECOMMUNICATIONS, LLC 8525 RIVERWOOD PARK DRIVE P.O. BOX 13860 LITTLE ROCK, AR 72113-0860</p>		
<p>LOUIS F. MCALISTER JR., PRESIDENT/CEO NAVIGATOR TELECOMMUNICATIONS, LLC 8525 RIVERWOOD PARK DRIVE P.O. BOX 13860 LITTLE ROCK, AR 72113-0860</p>		
<p>ANDREW NEWELL, GENERAL MANAGER NE COLORADO CELLULAR, INC. D/B/A VIAERO WIRELESS 1224 W PLATTE AVENUE FORT MORGAN, CO 80701</p>		
<p>DANIEL POPA, PRESIDENT NECC TELECOM, INC. 4969 US HIGHWAY 42 #2700 LOUISVILLE, KY 40222-6393</p>		

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NAME AND ADDRESS	NO. CERT. COPIES	NO. PLAIN COPIES
SANDRA WILLIAMS, TREASURER NET ONE INTERNATIONAL, INC. 6933 UNIVERSITY BLVD WINTER PARK, FL 32792		
REGULATORY & GOVERNMENTAL AFFAIRS NET TALK.COM INC. 1100 NW 163RD ST STE B-4 NORTH MIMAI BEACH, FL 33169		
KENNETH HOSFELD, VICE PRESIDENT NET TALK.COM, INC. 1100 NW 163 DRIVE, SUITE 3 NORTH MIAMI BEACH, FL 33169		
PETER CASTLE, COO NETWOLVES NETWORK SERVICES, LLC 4710 EISENHOWER BLVD, SUITE E8 TAMPA, FL 33634-6337		
JONATHAN KAUFMAN, MANAGER NETWORK BILLING SYSTEMS, L.L.C. 155 WILLOWBROOK BOULEVARD WAYNE, NJ 07470		
WILLIAM L. POPE, PRESIDENT NETWORK COMMUNICATIONS INTERNATIONAL CORP. 606 EAST MAGRILL STREET PO BOX 551 LONGVIEW, TX 75605-0551		
KAY KAMRAVA, PRESIDENT NETWORK ENHANCED TECHNOLOGIES, INC. 700 SOUTH FLOWER STREET, SUITE 420 LOS ANGELES, CA 90017		
TIMOTHY C. MARTIN NETWORK OPERATOR SERVICES, INC. 119 WEST TYLER, SUITE 260 LONGVIEW, TX 75601		
BOYAN JOSIC, PRESIDENT NETWORK SERVICE BILLING, INC. 7251 W LAKE MEAD BLVD STE 300 LAS VEGAS, NV 89128		

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NAME AND ADDRESS	NO. CERT. COPIES	NO. PLAIN COPIES
TONI VAN BURKLEO, CFO NETWORKIP, L.L.C. 119 WEST TYLER STREET SUITE 100 LONGVIEW, TX 75601		
JOHN HARRINGTON, SR VP - REGULATORY & LITIGATION NEUTRAL TANDEM-KANSAS LLC 550 W ADAMS ST STE 900 CHICAGO, IL 60661-3636		
KAREN BARLET, PRESIDENT NEW CENTURY TELECOM, INC. 3050 ROYAL BLVD S #175 ALPHARETTA, GA 30022		
KATHLEEN BEIGH SHOTSKY, MANAGER - LEC RELATIONS NEW EDGE NETWORK, INC. D/B/A EARTHLINK BUSINESS 3000 COLUMBIA HOUSE BOULEVARD SUITE 106 VANCOUVER, WA 98661		
GLEN NELSON, VP MARKETING & BUSINESS DEVELOPMENT NEW HORIZONS COMMUNICATIONS CORP. STE 100 420 BEDFORD ST LEXINGTON, MA 02420		
JOHN RANCE, CEO NEXPIRION, LLC 16458 BOLSA CHICA ST #20 HUNTINGTON BEACH, CA 92649		
KYN HYWANG NEXT FOCUS INC. 5000 HOPYARD RD #240 PLEASANTON, CA 94588		
JOHNIE JOHNSON, CEO/GEN MGR NEX-TECH WIRELESS, L.L.C 2418 VINE ST. HAYS, KS 67601		

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NAME AND ADDRESS	NO. CERT. COPIES	NO. PLAIN COPIES
VALERY RULE, REGULATORY NEX-TECH, INC. 145 N MAIN PO BOX 158 LENORA, KS 67645		
LARRY SEVIER, GENERAL MANAGER NEX-TECH, INC. 145 N MAIN PO BOX 158 LENORA, KS 67645		
JEFF WICK, COO NEX-TECH, INC. 145 N MAIN PO BOX 158 LENORA, KS 67645		
JEFF WICK, CHIEF OPERATING OFFICER NEX-TECH, INC. 2418 VINE STREET PO BOX 339 HAYS, KS 67601		
KENNETH SCHIFMAN, ATTORNEY NEXTEL WEST CORP. D/B/A NEXTEL KSOPHN0314-3A753 6450 SPRINT PKWY OVERLAND PARK, KS 66251		
ANTHONY RODRIGUEZ, REGULATORY AND CONTRACTS SPECIALIST NEXTG NETWORKS OF ILLINOIS, INC. D/B/A NEXTG NETWORKS CENTRAL 890 TASMAN DR MILPITAS, CA 95035-7439		
KIM ROBERT SCOVILL, SR. DIRECTOR, GOVERNMENT AFFAIRS NEXTGEN COMMUNICATIONS, INC. 275 WEST STREET, SUITE 400 ANNAPOLIS, MD 21401		

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NAME AND ADDRESS	NO. CERT. COPIES	NO. PLAIN COPIES
TRACY CONRAD NEXTIVA INC. 8800 E CHAPARALL RD STE 300 SCOTTSDALE, AZ 85250-2609		
DAVID LAFRANCE, REGULATORY AND EXTERNAL AFFAIRS NEXTLINK WIRELESS, LLC. 13865 SUNRISE VALLEY DRIVE HERNDON, VA 20171		
STEVEN FENKER, VICE PRESIDENT NEXUS COMMUNICATIONS, INC. 3629 CLEVELAND AVENUE, #C PO BOX 247168 COLUMBUS, OH 43224		
ROWENA HARDIN, REGULATORY COMPLIANCE NOS COMMUNICATIONS, INC. D/B/A 011 COMM., INTL PLUS, INTERNET BUSINESS ASSN., IVAN 250 PILOT RD STE 300 LAS VEGAS, NV 89119-3514		
JOSEPH T. KOPPY, PRESIDENT NOS COMMUNICATIONS, INC. D/B/A 011 COMM., INTL PLUS, INTERNET BUSINESS ASSN., IVAN 250 PILOT RD STE 300 LAS VEGAS, NV 89119-3514		
WILLIAM WRIGHT, GENERAL COUNSEL NOSVA, LIMITED PARTNERSHIP D/B/A CIERRACOM SYSTEMS 250 PILOT RD STE 300 LAS VEGAS, NV 89119-3514		
PAUL A. GOLIBART, PRESIDENT NOVATEL LTD. 11550 IH-10 WEST SUITE 110 SAN ANTONIO, TX 78230		

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NAME AND ADDRESS	NO. CERT. COPIES	NO. PLAIN COPIES
RICHARD A. CROSSWHITE, PRESIDENT NTS COMMUNICATIONS, INC. D/B/A ROCKY MOUNTAIN NTS COMMUNICATIO 5307 W LOOP 289 LUBBOCK, TX 79414-1610		
REGULATORY & GOVERNMENTAL AFFAIRS NUVIO CORPORATION 340 S LEMON AVE STE 9233 WALNUT, CA 91789-2706		
DENNIS W. DOYLE, GENERAL MANAGER ONE POINT TECHNOLOGIES, INC. D/B/A BLUE VALLEY TELE-COMMUNICATIONS 1559 PONY EXPRESS HIGHWAY HOME, KS 66438-9000		
R. J. DIAS, REGULATORY ADMINISTRATOR ONELINK COMMUNICATIONS, INC. 8400 NORTH UNIVERSITY DRIVE, SUITE 204 TAMARAC, FL 33321		
CHET HUBER, PRESIDENT ONSTAR CORP. 482-C16-B16 300 RENAISSANCE CENTER DETROIT, MI 48265-3000		
REGULATORY & GOVERNMENTAL AFFAIRS OOMA, INC. 1840 EMBARACADERO RD PALO ALTO, CA 94303		
KIRK SMITH, PRESIDENT OPERATOR SERVICE COMPANY, LLC 5302 AVENUE Q #6 LUBBOCK, TX 79401		
ALICE BRESLOW, COMPLIANCE PARALEGAL OPEX COMMUNICATIONS, INC. 3605 LONG BEACH BLVD #201 LONG BEACH, CA 90807		

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NAME AND ADDRESS	NO. CERT. COPIES	NO. PLAIN COPIES
REGULATORY & GOVERNMENTAL AFFAIRS OPEX COMMUNICATIONS, INC. 3605 LONG BEACH BLVD #201 LONG BEACH, CA 90807		
ATTN: MANAGER OF REGULATORY AFFAIRS PAETEC COMMUNICATIONS, INC. ONE PAETEC PLAZA 600 WILLOWBROOK OFFICE PARK FAIRPORT, NY 14450		
JUDITH MESSENGER, SR. MGR. REG. & PUBLIC POLICY PAETEC COMMUNICATIONS, INC. ONE PAETEC PLAZA 600 WILLOWBROOK OFFICE PARK FAIRPORT, NY 14450		
TIM SMITH, DIRECTOR OF REGULATORY AFFAIRS PAY TEL COMMUNICATIONS, INC. 4230 BEECHWOOD DRIVE GREENSBORO, NC 27410		
SCOTT KELL, VICE PRESIDENT OF OPERATIONS PEERLESS NETWORK OF KANSAS, LLC 222 S RIVERSIDE PLZ STE 2730 CHICAGO, IL 60606-6202		
DANIEL MELDAZIS PEERLESS NETWORK OF KANSAS, LLC 222 S RIVERSIDE PLZ STE 2730 CHICAGO, IL 60606-6202		
KATHY BILLINGER, CEO/GENERAL MANAGER PEOPLES TELECOMMUNICATIONS, LLC 208 N BROADWAY P O BOX 450 LA CYGNE, KS 66040		
KATHY BILLINGER, CEO/GENERAL MANAGER PEOPLES TELECOMMUNICATIONS, LLC 208 N BROADWAY P O BOX 450 LA CYGNE, KS 66040		

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NAME AND ADDRESS	NO. CERT. COPIES	NO. PLAIN COPIES
REGULATORY & GOVERNMENTAL AFFAIRS PHONE POWER, LLC 20847 SHERMAN WAY WINNETKA, CA 91306		
BRAIN LEVENTHAL ESQ. PHONE.COM 5606 WHITNEY MILL WAY NORTH BETHESDA, MD 20852		
CATHERINE MOYER, GENERAL MANAGER & CEO PIONEER TELEPHONE ASSN., INC. D/B/A PIONEER COMMUNICATIONS 120 WEST KANSAS AVENUE PO BOX 707 ULYSSES, KS 67880-0707		
Omar Ahmad, CEO PLANTINUMTEL COMMUNICATIONS, LLC 8108 S. Roberts Rd. Justice, IL 60458		
KAREN KOVACH, GENERAL COUNSEL PNG TELECOMMUNICATIONS, INC. D/B/A POWERNET GLOBAL COMM. 100 COMMERCIAL DRIVE FAIRFIELD, OH 45014		
RODERICK HILL POSTRACK TECHNOLOGIES, INC. 2740 COLUMBUS ST STE 300 OTTAWA, IL 61350-3771		
JOHN FILIPOWICZ, ACTING GENERAL COUNSEL PRIMUS TELECOMMUNICATIONS, INC. 7901 JONES BRANCH DRIVE SUITE 900 MCLEAN, VA 22102-3316		
REGULATORY & GOVERNMENTAL AFFAIRS PRIMUS TELECOMMUNICATIONS, INC. 7901 JONES BRANCH DRIVE SUITE 900 MCLEAN, VA 22102-3316		

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NAME AND ADDRESS	NO. CERT. COPIES	NO. PLAIN COPIES
DAVE LINDGREN, PRESIDENT PROTOCOL LLC 14927 S CAENEN LANE OLATHE, KS 66062		
DON DAVES PROXIMITI TECHNOLOGIES, INC. 5410 MARINER ST STE 175 TAMPA, FL 33601		
DOYLE SCHAEFERS, VICE PRESIDENT-OPERATIONS PUBLIC COMMUNICATIONS SERVICES, INC. 12021 SUNSET HILLS RD STE 100 RESTON, VA 20190-3296		
MARIUS MALAI, DIRECTOR PULSE TELECOM LLC 4969 US HWY #42 STE 2700 LOUISVILLE, KY 40222-6393		
ISSA ASAD Q LINK WIRELESS LLC 400 E SHERIDAN ST STE 300 DANIA BEACH, FL 33004-5501		
SCOTT SCHAEFER, PRESIDENT/CEO QUANTUMSHIFT COMMUNICATIONS, INC. C/O VCOM SOLUTIONS SUITE 418 12657 ALCOSTA BLVD SAN RAMON, CA 94583-4433		
ELISE ESCAMILLA, PRESIDENT QUASAR COMMUNICATIONS CORPORATION 15610 BOULDER OAKS DRIVE HOUSTON, TX 77084		
CATHY HANSEN QWEST COMMUNICATIONS COMPANY, LLC 1801 CALIFORNIA STREET 10TH FLOOR DENVER, CO 80202		

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NAME AND ADDRESS	NO. CERT. COPIES	NO. PLAIN COPIES
ADAM SHERR, SR. ATTORNEY - REGULATORY QWEST COMMUNICATIONS COMPANY, LLC 1600 7TH AVENUE, 3206 SEATTLE, WA 98191-0000		
JAMES LEDNICKY, GENERAL MANAGER RAINBOW TELECOMMUNICATIONS ASSOCIATION, INC. PO BOX 147 608 MAIN STREET EVEREST, KS 66424-0147		
BRANDI KNIGHT RAZORLINE, LLC P.O. BOX 8810 METAIRIE, LA 70011		
GARVIN HASSELL READY COMM, INC. 255 STANTON CT COPPELL, TX 75019		
CHRIS STEIN REDUCED RATE LONG DISTANCE, LLC 1800 PEMBROOKE DRIVE SUITE 300 ORLANDO, FL 32810		
LISA ROGERS, PRESIDENT RELIANT COMMUNICATIONS, INC. 801 INTERNATIONAL PARKWAY 5TH FLOOR LAKE MARY, FL 32746		
ALICIA G. TREDER, REGULATORY AND COMPLIANCE MANAGER RESIDENTIAL LONG DISTANCE, INC. 3100 BRECKINRIDGE BLVD STE 145 DULUTH, GA 30096-7564		
MARK WIDBIN, PRESIDENT REUNION COMMUNICATIONS, INC. 106 W CALENDAR AVE STE 190 LA GRANGE, IL 60525-2325		

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REGULATORY & GOVERNMENTAL AFFAIRS REVEAL COMMUNICATIONS 4880 INDUSTRIAL CIRCLE STE-3 LONGMONT, CO 80501		
JOHN MARLOW RING CENTRAL, INC. 1400 FASHION ISLAND BLVD STE 700 SAN MATEO, CA 94404-2073		
MARIA ELENA ZEPEDA, PRESIDENT ROMAN LD, INC. 2300 VALLEY VIEW LN STE 730 IRVING, TX 75062-1780		
MARY ANN MITCHELL, VICE PRESENT ROSEBUD TELEPHONE, LLC 501 WEST MAIN STREET PO BOX 597 ROSEBUD, TX 76570		
LARRY E SEVIER, CEO/GENERAL MGR RURAL TELEPHONE SERVICE COMPANY, INC. D/B/A Nex-Tech 145 N MAIN P O BOX 158 LENORA, KS 67645		
JANET BATHURST, GENERAL MANAGER S&A TELEPHONE COMPANY, INC. 413 MAIN STREET PO BOX 68 ALLEN, KS 66833		
STEVE RICHARDS, GENERAL MANAGER S&T COMMUNICATIONS LLC 320 KANSAS AVENUE PO BOX 99 BREWSTER, KS 67732		

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STEVE RICHARDS, GENERAL MANAGER S&T COMMUNICATIONS, INC. 320 KANSAS AVENUE PO BOX 99 BREWSTER, KS 67732		
STEVE RICHARDS, GENERAL MANAGER S&T TELEPHONE COOPERATIVE ASSOCIATION, INC. 320 KANSAS AVENUE PO BOX 99 BREWSTER, KS 67732		
SHERRI FLATT, DIRECTOR OF OPERATIONAL COMPLIANCE SAGE TELECOM, INC. 3300 E RENNER ROAD STE 350 RICHARDSON, TX 75082-2800		
ANDREW KARL, MANAGER OF REGULATORY COMPLIANCE SAGE TELECOM, INC. 3300 E RENNER ROAD STE 350 RICHARDSON, TX 75082-2800		
KHIEM NGO SAVING CALL, LLC 9999 BELLAIRE BLVD STE 1111 HOUSTON, TX 77036		
LISA ANDREJKO, ASSOCIATE DIRECTOR REGULATORY SBC LONG DISTANCE, LLC 5130 HACIENDA BLVD 3 SOUTH DUBLIN, CA 94568-7579		
COLLEEN DZIUBAN, DIR. GOVERNMENT AFFAIRS SECURUS TECHNOLOGIES, INC. 14651 DALLAS PARKWAY DALLAS, TX 75254		
JAMES CHRISTIANO SHOUTPOINT INC. 4695 MACARTHUR CT STE 930 NEWPORT BEACH, CA 92660		

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NAME AND ADDRESS	NO. CERT. COPIES	NO. PLAIN COPIES
KEN ADAMS SILV COMMUNICATION INC. 3460 WILSHIRE BLVD., SUITE 1103 LOS ANGELES, CA 90010		
CARL LAKEY SIMPLE MOBILE, LLC 111 PACIFICA STE 160 IRVINE, CA 92618-7424		
SCOTT EDELEN SINGLEPIPE, INC. 2106 BARDSTOWN RD FL 2 LOUISVILLE, KY 40205-1916		
GREGORY L. MIKESELL, SECRETARY TREASURER SKT, INC. PO BOX 800 112 SOUTH LEE CLEARWATER, KS 67026-0800		
KENDALL S. MIKESELL, PRESIDENT SKT, INC. PO BOX 800 112 SOUTH LEE CLEARWATER, KS 67026-0800		
ARTHUR PAQUETTE, ASSOCIATE DIRECTOR-FINANCE SNET AMERICA, INC. D/B/A AT&T LONG DISTANCE EAST 310 ORANGE STREET NEW HAVEN, CT 06510		
DANE JASPER, CEO SONIC TELECOM, LLC 2260 APOLLO WAY SANTA ROSA, CA 95407		
STEPHEN W. DAVIS, GENERAL MANAGER SOUTH CENTRAL TELEPHONE ASSN. INC. 101 S. MAIN PO DRAWER B MEDICINE LODGE, KS 67104		

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STEVE DAVIS, GENERAL MANAGER SOUTH CENTRAL WIRELESS, INC. D/B/A SCTELCOM 101 S MAIN STREET P.O. BOX B MEDICINE LODGE, KS 67104		
KENDALL S. MIKESELL, PRESIDENT SOUTHERN KANSAS TELEPHONE COMPANY, INC. 112 SOUTH LEE STREET PO BOX 800 CLEARWATER, KS 67026-0800		
JOHN R. KIRBY, PRESIDENT/DIRECTOR SOUTHWEST COMMUNICATIONS, INC. 4100 N MULBERRY DRIVE, SUITE 100 KANSAS CITY, MO 64116		
ANN HUGHES, DIRECTOR REGULATORY SOUTHWESTERN BELL TELEPHONE CO. D/B/A AT&T KANSAS 220 SE 6TH AVE RM 515 TOPEKA, KS 66603-3596		
ROSS ARTALE SPECTROTEL, INC. D/B/A ONETOUCH COMMUNICATIONS 3535 STATE HIGHWAY 66 STE 7 NEPTUNE, NJ 07753-2625		
ROSS ARTALE SPECTROTEL, INC. D/B/A TOUCH BASE COMMUNICATIONS 3535 STATE HIGHWAY 66 STE 7 NEPTUNE, NJ 07753-2625		
MICHAEL YOUNG SPENCER TELECOM, LLC 2 MANCHESTER CT MANSFIELD, TX 76063		
DIANE C. BROWNING, ATTORNEY SPRINT COMMUNICATIONS COMPANY L.P. KSOPHN0314-3A459 6450 SPRINT PKWY OVERLAND PARK, KS 66251		

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NAME AND ADDRESS	NO. CERT. COPIES	NO. PLAIN COPIES
KENNETH A. SCHIFMAN, ATTORNEY SPRINT COMMUNICATIONS COMPANY L.P. KSOPHN314-3A753 6450 SPRINT PKWY OVERLAND PARK, KS 66251		
DIANE C. BROWNING, ATTORNEY SPRINT SPECTRUM L.P. KSOPHN0314-3A459 6450 SPRINT PARKWAY OVERLAND PARK, KS 66251-2400		
PATRICK L. MORSE, PRESIDENT/GEN. MGR. ST LONG DISTANCE, INC. D/B/A SUNFLOWER LONG DISTANCE D/B/A FAIRPOINT LONG DI: 908 W. FRONTVIEW PO BOX 199 DODGE CITY, KS 67801		
LINDA PARKS, TAX MANAGER ST MESSAGING SERVICES, LLC 1720 LAKEPOINTE DR STE 100 LEWISVILLE, TX 75057		
NORMAN WORTHINGTON STAR2STAR COMMUNICATIONS LLC 600 TALLEVAST RD STE 202 SARASOTA, FL 34243		
SAMER TAWFIC, CEO STI PREPAID, LLC 1250 BROADWAY 26TH FLR NEW YORK, NY 10001		
DAVID E. BENGTSON, ATTORNEY STINSON MORRISON HECKER LLP 1625 N WATERFRONT PKWY STE 300 WICHITA, KS 67206-6620		
PHILIP BROWN SUMNER CABLE TV INC. 117 W. HARVEY P.O. BOX 468 WELLINGTON, KS 67152		

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NAME AND ADDRESS	NO. CERT. COPIES	NO. PLAIN COPIES
JACK KUHLMANN, DIRECTOR OF OPERATIONS SUNFLOWER TELEPHONE COMPANY, INC. D/B/A FAIRPOINT COMMUNICATIONS P O BOX 199 DODGE CITY, KS 67801-0199		
DAVID ROBINSON, MANAGER - PUBLIC POLICY SYNIVERSE TECHNOLOGIES, INC. 8125 HIGHWOODS PALM WAY TAMPA, FL 33647-1776		
FRANK DEL COL, CEO TAG MOBILE, LLC 1330 CAPITAL PARKWAY CARROLLTON, TX 75006		
CYNDI GALLAGHER, DIRECTORY-KANSAS REGULATORY TCG KANSAS CITY, INC. 220 E 6TH STREET ROOM 500 TOPEKA, KS 66603		
ANN HUGHES, DIRECTOR REGULATORY TCG KANSAS CITY, INC. 220 E 6TH STREET ROOM 500 TOPEKA, KS 66603		
FRANK SCHMALE TEAM ELECTRONICS 201 WEST KANSAS AVENUE GARDEN CITY, KS 67846		
THOMAS M FORTE, CONSULTANT TECHNOLOGIES MANAGEMENT, INC. 2600 MAITLAND CENTER PARKWAY SUITE 300 MAITLAND, FL 32751		
DAVID DAMIANI, SECRETARY TELATLANTIC COMMUNICATIONS, INC. 604 CAMERON STREET ALEXANDRIA, VA 22314		

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NAME AND ADDRESS	NO. CERT. COPIES	NO. PLAIN COPIES
EDWARD T. DEPP, MANAGER OF LEGAL AND REGULATORY AFFAIRS TELCOVE OPERATIONS, LLC 1025 ELDORADO BLVD BROOMFIELD, CO 80021		
MICHAEL CARBONNEAU TELEBLEND, LLC 300 CORNERSTONE DR STE 315 WILLISTON, VT 05495		
SUSAN BOUCHARD, PRESIDENT TELECOM MANAGEMENT, INC. D/B/A PIONEER TELEPHONE 39 DARLING AVE STE 1 S PORTLAND, ME 04106-2320		
C/O HALEH S. DAVARY, REG. REPORTING ANALYST TELECONNECT LONG DISTANCE SERVICES & SYSTEMS CO. D/B/A TELECOM*USA LONG DISTANCE COMPANY C/O WORLDCOM. INC.-WPPG 201 SPEAR STREET, 9TH FLOOR SAN FRANCISCO, CA 94105		
SONYA BLACKWELL TELEDIAS COMMUNICATIONS, INC. 5605 RIGGINS COURT, SUITE 265 RENO, NV 89502		
JEFFREY E. REYNOLDS, PRESIDENT TELEQUALITY COMMUNICATIONS, INC. 16601 BLANCO RD STE 207 SAN ANTONIO, TX 78232-1939		
TODD MISZNER TELESPHERE NETWORKS LTD 9237 E VIA DE VENTURA STE 250 SCOTTSDALE, AZ 85258-3661		
ROBERT E SPANGLER JR, PRESIDENT/CEO TELEWEST IV INC. P.O. BOX 312 EDWARDS, CO 81532-0312		

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NAME AND ADDRESS	NO. CERT. COPIES	NO. PLAIN COPIES
<p>TERRY RUTH TELIAX, INC. 1001 16TH ST B 180 #102 DENVER, CO 80265</p>		
<p>BOBBI FERGUSON, CONSULTANT TELMEX USA, L.L.C. C/O VISOLOGY, INC. 16061 CARMEL BAY DRIVE NORTHPORT, AL 35475</p>		
<p>DARRYL E. DAVIS, CEO TELRITE CORPORATION 1480 TERRELL MILL ROAD SE SUITE 1 MARIETTA, GA 30067</p>		
<p>STEVE KOHINOS THINKING PHONE NETWORKS, LLC 54 WASHBURN AVE CAMBRIDGE, MA 02140</p>		
<p>JULIE P LAINE, VP & CHIEF COUNSEL REGULATORY TIME WARNER CABLE INFORMATION SERVICES (KANSAS), LLC 60 COLUMBUS CIRCLE FLOOR 17 NEW YORK, NY 10023-5860</p>		
<p>TERI OHTA, CORP. COUNSEL/STATE REGULATORY AFFAIRS T-MOBILE 12920 SE 38TH ST. BELLEVUE, WA 98006</p>		
<p>NANCY K. LEE, EXEC. VP T-NETIX, INC. 14651 DALLAS PARKWAY SUITE 600 DALLAS, TX 75254-8815</p>		
<p>GARY BARLOW, CFO TON SERVICES, INC. 1104 COUNTRY HILLS DR OGDEN, UT 84403-2400</p>		

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NAME AND ADDRESS	NO. CERT. COPIES	NO. PLAIN COPIES
CHRISTIE PEREZ, TAX CONSULTANT TOPEKA CELLULAR TELEPHONE COMPANY D/B/A VERIZON WIRELESS ONE VERIZON WAY BASKING RIDGE, NJ 07920		
MARK M. GAILEY, PRESIDENT & GENERAL MANAGER TOTAH COMMUNICATIONS, INC. 101 MAIN STREET PO BOX 300 OCHELATA, OK 74051-0300		
NATHANIEL LAW, CORPORATE COUNSEL TOTAL CALL MOBILE, INC. 1411 W 190TH ST STE 700 GARDENA, CA 90248-4376		
MARK LEAFSTEDT, CEO TOTAL CALL MOBILE, INC. 1411 W 190TH ST STE 700 GARDENA, CA 90248-4376		
ALICE BRESLOW, COMPLIANCE PARALEGAL TOTAL HOLDINGS, INC. D/B/A GTC COMMUNICATIONS 3605 LONG BEACH BLVD STE 201 LONG BEACH, CA 90807		
MARK GAILEY, GENERAL MANAGER TOTEL CUSTOMER SERVICES, INC. 101 MAIN PO BOX 300 OCHELATA, OK 74051		
GARY GLODEK, DIRECTOR, RETAIL OPERATIONS TOUCHTONE COMMUNICATIONS INC. 16 SOUTH JEFFERSON ROAD WHIPPANY, NJ 07981		
RICHARD B. SALZMAN, EXECUTIVE VICE PRESIDENT TRACFONE WIRELESS, INC. 9700 N.W. 112TH AVENUE MIAMI, FL 33178		

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NAME AND ADDRESS	NO. CERT. COPIES	NO. PLAIN COPIES
STELLA GNEPP, REGULATORY AFFAIRS SPECIALIST TRANS NATIONAL COMMUNICATIONS INTERNATIONAL, INC. 2 CHARLESGATE WEST BOSTON, MA 02215		
ERICK ROBINSON, TAX & REG SPECIALIST TRANS NATIONAL COMMUNICATIONS INTERNATIONAL, INC. 2 CHARLESGATE WEST BOSTON, MA 02215		
LOURDIS VINAS, DIRECTOR, REGULATORY & COMPLIANCE TRANSWORLD NETWORK CORP. 255 PINE AVE N OLDSMAR, FL 34677-4630		
REGULATORY & GOVERNMENTAL AFFAIRS TRI-COUNTY COMMUNICATIONS 228 UNION ST PACIFIC, MO 63069		
DALE JONES, GENERAL MANAGER TRI-COUNTY TELEPHONE ASSOCIATION, INC. 1568 S 1000 ROAD PO BOX 299 COUNCIL GROVE, KS 66846		
JOHN MARSCH, CHIEF EXECUTIVE OFFICER TRI-M COMMUNICATIONS, INC. D/B/A TMC COMMUNICATIONS 5LINX ENTERPRISES, INC. 275 KENNETH DR ROCHESTER, NY 14623		
KEVIN BRIAN COX, CEO TRUE WIRELESS, LLC 3124 BROTHER BLVD #104 BARTLETT, TN 38133		
C/O HALEH S. DAVARY, REG REPORTING ANALYST TTI NATIONAL, INC. C/O WORLDCOM, INC.-WPPG 201 SPEAR STREET, 9TH FLOOR SAN FRANCISCO, CA 94105		

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NAME AND ADDRESS	NO. CERT. COPIES	NO. PLAIN COPIES
PAMELA SHERWOOD, VP OF REGULATORY, CENTRAL REGION TW TELECOM OF KANSAS CITY LLC TIME WARNER TELECOM 10475 PARK MEADOWS DRIVE LITTLETON, CO 80124		
JULIE LAINE, VP & CHIEF COUNSEL TWC (TIME WARNER) DIGITAL PHONE LLC 60 COLUMBUS FL 17 NEW YORK, NY 10023-5860		
JOHN F. GISSELBECK, PRESIDENT TWIN VALLEY COMMUNICATIONS, INC. 22 SPRUCE PO BOX 395 MILTONVALE, KS 67466		
BEN FOSTER, PRESIDENT/COO TWIN VALLEY TELEPHONE, INC. 22 SPRUCE PO BOX 395 MILTONVALE, KS 67466		
ROBERT YOUNG, PRESIDENT U.S. TELECOM LONG DISTANCE, INC. D/B/A US SOUTH / INCOM 3960 HOWARD HUGHES PARKWAY SUITE 500 LAS VEGAS, NV 89109		
MATTHEW VAN HOESSEN UNITE PRIVATE NETWORKS, LLC 950 WEST 92 HIGHWAY SUITE 203 KEARNEY, MO 64060		
LAWRENCE VIERTHALER, PRESIDENT UNITED COMMUNICATIONS ASSOCIATION, INC. 1107 MCARTOR RD BOX 117 DODGE CITY, KS 67801		
GEORGE COLLINS, VICE PRESIDENT UNITED TELECOM INC. 3550 WILSHIRE BLVD., 17TH FLOOR LOS ANGELES, CA 90010		

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NAME AND ADDRESS	NO. CERT. COPIES	NO. PLAIN COPIES
CRAIG MOCK, GENERAL MANAGER UNITED TELEPHONE ASSN., INC. 1107 MCARTOR RD PO BOX 117 DODGE CITY, KS 67801		
JOHN R IDOUX, STATE DIRECTOR REGULATORY AFFAIRS UNITED TELEPHONE CO. OF KANSAS D/B/A CENTURYLINK 5454 W 110TH STREET OVERLAND PARK, KS 66211-1204		
DON HOWELL, PRESIDENT UNITED WIRELESS COMMUNICATIONS, INC. 1107 MCARTOR ROAD PO BOX 117 DODGE CITY, KS 67801		
BASSAM ABDALLAH, DIRECTOR OF OPERATIONS US CONNECT LLC 11029 HARRY HINES BLVD STE B117 DALLAS, TX 75229-5785		
MARK COSTELLO, PRESIDENT/CEO USA DIGITAL COMMUNICATIONS, INC. 300 JOHNNY BENCH DRIVE SUITE 120 OKLAHOMA CITY, OK 73104-2471		
SHIRLEY B. WHITE USA MOBILITY WIRELESS 6850 VERSAR CTR STE 420 SPRINGFIELD, VA 22151-4148		
GRANT SPELLMEIER, DIRECTOR, EXTERNAL AFFAIRS USCOC OF NEBRASKA/KANSAS LLC 8410 BRYN MAWR CHICAGO, IL 60631		
BRADLEY STEIN, DIRECTOR, EXTERNAL AFFAIRS USCOC OF NEBRASKA/KANSAS LLC 8410 BRYN MAWR CHICAGO, IL 60631		

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<p>KERMIT HEATON, EXEC. VP VALUE-ADDED COMMUNICATIONS, INC. 12021 SUNSET HILLS RD STE 100 RESTON, VA 20190-3296</p>		
<p>RICHARD LEE TIDWELL, MANAGING PARTNER VALU-NET LLC 2914 W HIGHWAY 50 STE A EMPORIA, KS 66801-5394</p>		
<p>CHIP WERNER, VICE PRESIDENT-OPERATIONS VELOCITY THE GREATEST PHONE COMPANY EVER, INC. 7130 SPRING MEADOWS WEST DRIVE HOLLAND, OH 43528</p>		
<p>ERIC ELFE VELOCITY WIRELESS, LLC 70 WOOD AVENUE SOUTH 3RD FLOOR ISELIN, NJ 08830</p>		
<p>CHERYL CAPPS, SENIOR CONSULTANT VERIZON ENTERPRISE SOLUTIONS, LLC 22001 LOUDOUN COUNTY PKWY ASHBURN, VA 20147</p>		
<p>CHERYL CAPPS, SENIOR CONSULTANT VERIZON LONG DISTANCE, LLC 22001 LOUDOUN COUNTY PKWY ASHBURN, VA 20147</p>		
<p>BRENDON BRADER VIATALK, INC. 21 CORPORATE DRIVE STE. 203 CLIFTON PARK, NY 12065</p>		

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SCOTT GOODWIN, CEO VINCULUM COMMUNICATIONS, INC. D/B/A Vintalk 9797 WAPLES ST STE 201 SAN DIEGO, CA 92121		
KATHLEEN MAKAS VIRGIN MOBILE USA, L.P. 10 INDEPENDENCE BLVD WARREN, NJ 07059		
CHRISTOPHER HALL VITELITY VOICE INC. 317 INVERNESS WAY SOUTH STE 140 ENGLEWOOD, CO 80112		
LIAM MCELHONE, PRESIDENT VOCALOCITY 1375 PEACHTREE ST NE #200 ATLANTA, GA 30309-3103		
STACI L. PIES, PRESIDENT VOICE ON THE NET (VON) COALITION 5512 AMESFIELD COURT ROCKVILLE, MD 20853		
MICHAEL HEINRICH VOICE RING, INC. PMB 346 4044 W LAKE MARY BLVD LAKE MARY, FL 32746		
KEVIN MORAN, PRESIDENT VOICECOM TELECOMMUNICATIONS, LLC 5900 WINDWARD PARKWAY ALPHAETTA, GA 30005		
JASON TAPOLCI,, PRESIDENT VOIPSTREET, INC. EIGHT PENN CENTER WEST STE 101 PITTSBURG, PA 15276		

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PLEASE FORWARD THE ATTACHED DOCUMENT (S) ISSUED IN THE ABOVE-REFERENCED DOCKET TO THE FOLLOWING:

NAME AND ADDRESS	NO. CERT. COPIES	NO. PLAIN COPIES
BRENDAN KASPAR VONAGE D/B/A VONAGE 23 MAIN STREET HOLMDEL, NJ 07733-2136		
MARK RICHARDS VOX COMMUNICATIONS CORP. 75 SOUTH BORADWAY STE 302 WHITE PLAINS, NY 10601		
STEVEN L SACKRIDER, PRESIDENT/GEN MGR WAMEGO TELECOMMUNICATIONS COMPANY, INC. 1009 LINCOLN PO BOX 25 WAMEGO, KS 66547-0025		
ANDREW PLOCIIENNECZAK WDT WIRELESS 13644 NEUTRON RD DALLAS, TX 75244		
SARAH MONTGOMERY, DIR. OF GOV. RELATIONS WESTEL, INC. 8303 N MO PAC EXPY SUITE C400 AUSTIN, TX 78759-8370		
CATHERINE MOYER, DIRECTOR, LEGAL & REGULATORY AFFAIRS WESTLINK COMMUNICATIONS, L.L.C. 120 WEST KANSAS AVENUE ULYSSES, KS 67880		
KARIL REIBOLD WHALEBACK SYSTEMS 2 INTERNATIONAL DRIVE STE 150 PORTSMOUTH, NH 03801-6820		
ARCHIE MACIAS, GENERAL MANAGER WHEAT STATE TELEPHONE COMPANY, INC. PO BOX 320 UDALL, KS 67146		

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<p>CHRIS S. BARTON, PRESIDENT WHOLESAL CARRIER SERVICES, INC. 5471 N UNIVERSITY DR CORAL SPRINGS, FL 33067-4634</p>		
<p>DANIEL P. FRIESEN, OWNER WILDFLOWER TELECOMMUNICATIONS, LLC 102 NORTH MAIN PO BOX 258 BUHLER, KS 67522</p>		
<p>BRIAN BOISVERT, MANAGER WILSON COMMUNICATIONS, INC. D/B/A WTCI LONG DISTANCE 2504 AVENUE D PO BOX 190 WILSON, KS 67490</p>		
<p>BRIAN BOISVERT, GENERAL MANAGER WILSON TELEPHONE COMPANY, INC. 2504 AVENUE D BOX 190 WILSON, KS 67490-0190</p>		
<p>KATHY L. HOUGH, ANALYST, REGULATORY AFFAIRS WILTEL COMMUNICATIONS, LLC LEVEL 3 COMMUNICATIONS 1025 ELDORADO BLVD BROOMFIELD, CO 80021</p>		
<p>JAMES MACKENZIE, PRES., CEO AND SECRETARY WIMACTEL, INC. 2225 E BAYSHORE RD STE 200 EAST PALO ALTO, CA 94303-3220</p>		
<p>JOHN MONAHAN WIND CURRENTS, INC. 12 ARNOLD DR WOODSTOCK, NY 12498-1701</p>		
<p>KRISTY GIEMANN WINDJAMMER COMMUNICATIONS LLC 8500 WEST 110TH STREET SUITE 600 OVERLAND PARK, KS 66210</p>		

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STEVE MERADITH, STAFF MANAGER-EXTERNAL AFFAIRS WINDSTREAM COMMUNICATIONS, INC. 1800 OLD PECOS TRL STE J SANTA FE, NM 87505-4759		
ANTHONY GILLETTE, CORPORATE COUNSEL WINDSTREAM NORLIGHT, INC. 1440 M ST BOX 81309 LINCOLN, NE 68508-2513		
SKIP PARSONS, CUSTOMER SERVICES WINDSTREAM NORLIGHT, INC. 1440 M ST BOX 81309 LINCOLN, NE 68508-2513		
LEZLIE YOUNG, MANAGER-REGULATORY REPORTING WINDSTREAM NORLIGHT, INC. 4001 RODNEY PARHAM LITTLE ROCK, AR 72212		
ED CORR, VICE PRESIDENT TAX WINDSTREAM NTI, INC. 1440 M ST BOX 81309 LINCOLN, NE 68508-2513		
ANTHONY GILLETTE, CORPORATE COUNSEL WINDSTREAM NTI, INC. 1440 M ST BOX 81309 LINCOLN, NE 68508-2513		
STEVE MERADITH, VP-STATE GOVT AFFAIRS WINDSTREAM NUVOX KANSAS, INC. 4001 RODNEY PARHAM ROAD LITTLE ROCK, AR 72212		
WALTER MCGEE WORKING ASSETS FUNDING SERVICE, INC. D/B/A CREDO LONG DISTANCE 101 MARKET ST #700 SAN FRANCISCO, CA 94105-1530		

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STEVEN L. SACKRIDER, PRESIDENT WTC COMMUNICATIONS, INC. 529 LINCOLN PO BOX 25 WAMEGO, KS 66547		
MARK PAVOL, SECRETARY/TREASURER X2COMM, INC. D/B/A DIRECT CONNECT 270 S. MAIN STREET FLEMINGTON, NJ 08822		
REGULATORY & GOVERNMENTAL AFFAIRS XCAST LABS 1801 AVENUE OF THE STARS STE 1220 LOS ANGELES, CA 90067		
KELLY FAUL, REGULATORY AFFAIRS DIRECTOR XO COMMUNICATIONS SERVICES, LLC 13865 SUNRISE VALLEY DRIVE HERNDON, VA 20171		
KELLY FAUL, REGULATORY AFFAIRS DIRECTOR XO COMMUNICATIONS SERVICES, LLC CORPORATE HEADQUARTERS 13865 SUNRISE VALLEY DRIVE HERNDON, VA 20171		
MARY CEGELSKI, MANAGER OF REGULATORY AFFAIRS XTENSION SERVICE INC. 3340 WEST MARKET STREET ARKON, OH 44333		
REGULATORY & GOVERNMENTAL AFFAIRS YAHOO!, INC. 721 FIRST AVE. SUNNYVALE, CA 94089		
PETER RUSSO, CFO YMAX COMMUNICATIONS CORP. 5700 GEORGIA AVENUE P.O. BOX 6785 WEST PLAM BEACH, FL 33405-6785		

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NAME AND ADDRESS	NO. CERT. COPIES	NO. PLAIN COPIES
DALE SCHMICK, VICE-PRESIDENT/GEN. MANAGER YOURTEL AMERICA, INC. 401 E MEMORIAL ROAD STE 500 OKLAHOMA CITY, OK 73114		
PETER CHEVALIER, ASSOCIATE GENERAL COUNSEL ZAYO GROUP, LLC 400 CENTENNIAL PKWY STE 200 LOUISVILLE, CO 80027-1210		
KATHY PRICE, GENERAL MANAGER ZENDA TELEPHONE COMPANY, INC. 208 NORTH MAIN PO BOX 128 ZENDA, KS 67159		
JAMES MILLER ZIP CONFERENCING, INC. 19 CHAMBERLAIN RD FLEMINGTON, NJ 808822		
LAWTON BLOOM, VP ZONE TELECOM, LLC 3130 PLEASANT RUN SPRINGFIELD, IL 62711-6347		
LUIS V. CIPRIANI, VICE PRESIDENT ZOOM-I-NET COMMUNICATIONS, INC. D/B/A ZINTEL 198 NORTH RIDGE DRIVE CENTRAL SQUARE, NY 13036		
REGULATORY & GOVERNMENTAL AFFAIRS ZTARMOBILE, INC. 16 VILLAGE LN STE 250 COJLEYVILLE, TX 76034-2950		

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