

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Investigation Regarding Intrastate :
Access Charges and IntraLATA Toll :
Rates of Rural Carriers and :
The Pennsylvania Universal :
Service Fund :

Docket No. I-00040105

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AT&T Communications of :
Pennsylvania, LLC :
Complainant :

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

v. :

Docket Nos. C-2009-2098380, *et al.*

Armstrong Telephone Company - :
Pennsylvania, et al. :
Respondents :

**DIRECT TESTIMONY OF
DR. BRIAN K. STAIHR**

**ON BEHALF OF
THE UNITED TELEPHONE COMPANY OF PENNSYLVANIA LLC
d/b/a CENTURYLINK**

STATEMENT 2.0

4/15/10
Hog FX

Prefiled: January 20, 2010

1 **I. INTRODUCTION AND PURPOSE OF TESTIMONY**

2 **Q. PLEASE STATE YOUR NAME, TITLE, AND BUSINESS ADDRESS.**

3 **A.** ~~My name is Brian K. Staihr. I am currently employed by the University of~~
4 ~~Kansas as Lecturer in Economics. My business address is 351 Snow Hall, The~~
5 ~~University of Kansas, Lawrence, Kansas 66045. I am also currently employed by~~
6 ~~CenturyLink as Regulatory Economist in the Department of Regulatory~~
7 ~~Operations and Policy. My business address is 5454 W. 110th Street, Overland~~
8 ~~Park, Kansas 66211. I am also currently employed by Avila University as~~
9 ~~Adjunct Professor of Economics. My business address is Department of~~
10 ~~Economics-Whitfield Hall, Avila University, 11901, Wornall Road, Kansas City,~~
11 ~~Missouri 64145.~~

12
13 **Q. ON WHOSE BEHALF ARE YOU TESTIFYING?**

14 **A.** ~~I am testifying on behalf of The United Telephone Company of Pennsylvania~~
15 ~~LLC d/b/a CenturyLink (f/d/b/a Embarq Pennsylvania) hereinafter~~
16 ~~("CenturyLink" or "Company").~~

17
18 **Q. BRIEFLY DESCRIBE YOUR EDUCATION AND PROFESSIONAL**
19 **EXPERIENCE.**

20 **A.** ~~I hold a B.A. in Economics from the University of Missouri-Kansas City, and an~~
21 ~~M.A. and Ph.D. in Economics from Washington University in St. Louis. My field~~
22 ~~of specialization is Industrial Organization, including Regulation. I have been~~
23 ~~teaching economics to undergraduate and graduate students for approximately~~

1 seventeen years. During that same time I have also served as economist for
2 (initially) Sprint Corporation, followed by Embarq Corporation, and most recently
3 CenturyLink.

4
5 Currently I am employed in the Regulatory Operations and Policy department of
6 CenturyLink. However, my initial position at Sprint was that of Manager -
7 Consumer Demand Forecasting in the marketing research department of Sprint's
8 Local Telecom Division. In that position my responsibilities included forecasting
9 the demand for services in the local market, (including basic local service and
10 vertical services), and producing elasticity studies and economic and quantitative
11 analysis for business cases and opportunity analyses. In that capacity, I worked
12 extensively with the Sprint Local Division's Market Research managers to 1)
13 undertake primary market research and 2) utilize secondary market research to
14 obtain the data necessary to forecast the demand for services. I began working in
15 Sprint's Regulatory Department with the passage of the Telecommunications Act of
16 1996 ("Telecom Act"). In the fourteen years since the passage of the Telecom Act I
17 have testified before Congress on various telecommunications issues and my
18 research has been used in Congressional oversight hearings. I have appeared before
19 the Commissions or Boards of the following states: Pennsylvania, Kansas,
20 Virginia, New Jersey, Texas, Florida, North Carolina, South Carolina, Nevada,
21 Illinois, Indiana, Tennessee, Missouri, Georgia, California, New Mexico,
22 Minnesota, and Nebraska. I have also testified before the Federal Communications
23 Commission ("FCC"), worked extensively with the FCC's Staff, and presented

1 original research to the FCC. Since the passage of the Telecom Act I have testified
2 on the economic aspects of various issues including (but not limited to) universal
3 service, access reform, local competition, pricing and costing, marketplace issues,
4 cost of capital, affordability, and more.

5
6 In January 2000, I left the telecommunications industry temporarily to serve as
7 Senior Economist for the Federal Reserve Bank of Kansas City. There I was an
8 active participant in the Federal Open Market Committee process, the process by
9 which the Federal Reserve sets interest rates. In addition, I conducted original
10 research on telecommunication issues and the effects of deregulation. I returned to
11 the industry in December 2000.

12
13 **Q. WHAT IS THE PURPOSE OF THIS DIRECT TESTIMONY IN THIS**
14 **PROCEEDING?**

15 **A.** The purpose of my testimony in this proceeding is to discuss the economic
16 implications of a very short survey that was conducted recently among
17 CenturyLink's Pennsylvania customers. The purpose of the survey was to
18 understand how Pennsylvanians would react when faced with an increase in the
19 price they pay for wireline telephone service.

1 **Q. AT&T, VERIZON, COMCAST, AND SPRINT SUGGEST THAT RURAL**
2 **ILECS CAN RECOVER DISPLACED SWITCHED ACCESS REVENUES**
3 **THROUGH RETAIL RATES. IS THIS STATEMENT ACCURATE?**

4 **A.** No. The Commission should be commended for its past proactive actions to
5 reduce switched access rates and permit measured increases to residential retail
6 basic local service rates. However, it is important for the Commission to
7 recognize that the telecommunications marketplace in 2010 is a very different
8 animal than it was only a few years ago. Consequently, we must not assume that
9 what might have been reasonable or viable options in the past remain reasonable
10 or viable today.

11

12 The suggestion that CenturyLink can automatically, easily, or successfully
13 recover any displaced switched access revenues through retail rate increases to its
14 end-users is fundamentally flawed. To understand why, it is important for the
15 Commission to keep in mind that the communications marketplace—in
16 Pennsylvania and everywhere—has evolved dramatically since the dawn of the
17 21st century. In recent years, our business has witnessed a dramatic
18 transformation in terms of how consumers view ILEC-provided basic local
19 telephone services, as an increasing number of competitive options are made
20 available for the majority of customers. In simplest terms, for many customers
21 wireline service has become disposable. What was once considered a necessity is
22 now considered unnecessary or a luxury. More importantly, in difficult economic
23 times such as these, our service has become a prime target for customers looking

1 for ways to save money. Consider the following sample of Internet headlines
2 available from any search engine: “Ten Ways Small Businesses Can Cut Costs;
3 #1: Cut the Landline”¹, “Making the Cut: Getting Rid of the Landline”²,
4 “Verizon: Cut Your Landline to Save Money”³, “Cut the Landline and Save
5 Money”⁴, “If You Want to Save Money, Cut the Cord”⁵, and “AT&T Profits Dip
6 as More Subscribers Cut Landline”⁶.

7
8 **Q. WHAT EXACTLY DOES THIS HAVE TO DO WITH THE SUGGESTION**
9 **THAT LOST ACCESS REVENUES CAN BE RECOVERED FROM THE**
10 **RATES OF OTHER RETAIL SERVICES?**

11 **A.** In a time when many customers are viewing their landlines as unnecessary, even
12 disposable, it is simply illogical to believe that upward retail rate adjustments
13 would be tolerated by many customers, particularly CenturyLink’s rural
14 Pennsylvania customers who already pay an \$18 per month rate. In short, the
15 company does not have the ability to *actually recover* lost access revenue from
16 other services, because many customers will not accept such adjustments.

17
18 **Q. DO YOU HAVE ANY EVIDENCE TO SUPPORT THIS STATEMENT?**

19 **A.** Yes. In preparation for this testimony, CenturyLink conducted a very short, but
20 very “to-the-point” survey of its Pennsylvania customers. The survey was

¹ <http://blogs.techrepublic.com.com/10things/?p=390>

² <http://savinggreenville.com/2009/05/14/making-the-cut-getting-rid-of-the-land-line/>

³ <http://www.dslreports.com/shownews/Verizon-Cut-Your-Landline-To-Save-Money-103232>

⁴ <http://myprops.org/content/Cut-the-landline-save-money-video/>

⁵ http://www.economist.com/opinion/displayStory.cfm?story_id=14213965

⁶ http://www.nj.com/business/index.ssf/2009/10/att_profit_dips_as_more_subscr.html

1 conducted by an outside market research firm with the intended purpose of
2 understanding how Pennsylvania residents would respond to an increase in retail
3 rates, the type of increase that would be necessary to recover lost access revenue.
4 The survey questionnaire, raw data and labels to raw data are attached as Exhibit
5 BKS-1, Exhibit BKS-2 and Exhibit BKS-3, respectively.

6
7 **Q. WAS THIS SURVEY PREPARED AND CONDUCTED UNDER YOUR**
8 **DIRECT SUPERVISION?**

9 A. Yes. I worked very closely with CenturyLink's market research department, and
10 the outside market research firm that we employed, but the survey was prepared
11 and conducted under my direct supervision.

12
13 **Q. IS THIS SURVEY PENNSYLVANIA SPECIFIC?**

14 A. Yes. The survey was conducted by telephone among a random sample of
15 CenturyLink's Pennsylvania customers during one week in December 2009. It
16 was our desire to "take the temperature" of Pennsylvania residents regarding their
17 potential reaction to upward price adjustments

18
19 **Q. HAVE THE SURVEY RESULTS BEEN PROVIDED TO THE OTHER**
20 **PARTIES IN THIS PROCEEDING?**

21 A. Yes, except that it is important to note that the "results" of the survey are simply
22 the survey's raw data itself, taken from customers. CenturyLink did not request
23 that the outside market research firm produce a formal report or any extensive

1 analysis. The information contained in the paragraphs below is the result of
2 simple tabulations done on the raw data, the kind that can (literally) be computed
3 by any person with access to the data and a spreadsheet or even a hand-held
4 calculator.

5
6 **Q. WHAT, SPECIFICALLY, DID THE SURVEY ASK PENNSYLVANIA**
7 **RESIDENTS?**

8 **A.** The survey asked respondents—in a very straightforward manner—how likely
9 they would be to leave CenturyLink if the price of their service increased by \$2,
10 by \$3, by \$4, or by \$5 monthly. The act of “leaving” CenturyLink was described
11 as either 1) “cutting the cord” and relying solely on wireless service, or 2)
12 switching to an alternate wireline provider. The respondents were asked to give
13 an answer on a 1-10 scale where “10” would be “Definitely Leave” if faced with a
14 price increase, and “1” would be “Definitely Not Leave” if faced with the same
15 price increase.

16
17 **Q. WHAT DID THE RESULTS SHOW?**

18 **A.** The responses to this specific question were grouped as follows: Answers of “10”,
19 “9” and “8” were considered *highly likely to leave* CenturyLink if faced with a
20 price increase. Answers of “1”, “2” and “3” were considered *highly likely not to*
21 *leave* CenturyLink when faced with the same price increase. The table below
22 shows the percentage of respondents to the survey who fell into the “*highly likely*
23 *to leave*” CenturyLink category, at various price levels.

1

If faced with this price increase...	Percentage of respondents "highly likely" to leave CenturyLink...
\$2 monthly	29.5%
\$3 monthly	41.4%
\$4 monthly	53.1%
\$5 monthly	61.5%

2

3 Of course, the important point for the Commission to consider here is that when a
4 customer "leaves" CenturyLink this means that the customer's total revenue—not
5 just "access replacement" revenue—is no longer available to the Company.

6

7 **Q. IS IT POSSIBLE THAT THE SURVEY'S RESULTS ARE OVERLY-**
8 **REFLECTIVE OF CUSTOMERS WHO MIGHT BE PRE-DISPOSED TO**
9 **LEAVE CENTURYLINK?**

10 **A.** No. Another question in the short survey asked the respondent about his or her
11 overall level of satisfaction with CenturyLink's service. On a 1-10 scale a score
12 of "10" was "Extremely Satisfied" while a score of "1" was "Extremely
13 Dissatisfied" with our service. The responses to this specific question were
14 grouped as follows: Answers of "10", "9" "8" and "7" were considered *highly*
15 *satisfied* with CenturyLink service. Answers of "1", "2" and "3" were considered

1 *highly dissatisfied* with CenturyLink service. The table below shows the
2 percentage of respondents to the survey who fell into each of these categories.

Respondents who were...	Percentage of respondents...
Highly satisfied with CenturyLink	79.1%
Neither highly satisfied nor highly dissatisfied with CenturyLink	15.6%
Highly dissatisfied with CenturyLink	4.2%
TOTAL (< 100 due to rounding):	98.9%

3
4 In summary, the survey respondents were clearly satisfied with CenturyLink's
5 service and, we can reasonably assume, not pre-disposed to leave. Therefore, the
6 impacts of the proposed price changes (in the first table) do not reflect other
7 factors such as a (possible) pent-up desire to discontinue service.

8
9 **Q. CAN YOU FURTHER EXPLAIN THE IMPACTS OF THE FIRST TABLE**
10 **SHOWING CUSTOMERS' REACTIONS WHEN FACED WITH**
11 **POSSIBLE RETAIL RATE ADJUSTMENTS?**

12 A. The data shown in the first table refutes the misleading notion that "revenue
13 neutrality" could be achieved simply by allowing CenturyLink flexibility to adjust
14 its retail rates. Consider the following scenario:

- 1 • Assume the Commission mandated a reduction in switched access rates
2 that equated to \$500,000 monthly.
- 3 • Assume a customer base of 250,000 residential and business customers in
4 PA. (This is a conservative assumption.)
- 5 • This \$500,000 reduction would equate to a \$2-per-month adjustment of
6 some retail rate to achieve (purported) “revenue neutrality”.
- 7 • Finally, also assume the average-revenue-per customer in PA is \$40
8 monthly.
- 9 • The 29.5% who would be “highly likely to leave” CenturyLink when
10 facing a \$2 increase represent $(.295) \times (250,000)$ or approximately 73,750
11 customers.
- 12 • Conclusion #1: At \$40 monthly, this represents $(\$40 * 73,750)$ or \$2.95
13 million of **lost revenue monthly**.
- 14 • Conclusion #2: None of this lost revenue is offset by the remaining
15 176,250 customers, since their additional \$2 monthly equates to \$352,500
16 and does not even offset the initial \$500,000 reduction.
- 17 • Conclusion #3: The \$2.95 million loss plus the access offset shortfall
18 equate to a net loss of \$3.1 million monthly. Such an outcome is certainly
19 not “revenue neutral”.

1 Q. IS IT NOT THE CASE THAT SOMETIMES PEOPLE RESPOND TO A
2 SURVEY IN ONE MANNER, BUT ACT IN A DIFFERENT MANNER?
3 WHAT IF ONLY A PORTION OF THOSE RESPONDENTS “HIGHLY
4 LIKELY” TO LEAVE CENTURYLINK ACTUALLY LEAVE?

5 A. In that case, the size of the loss would be different, but the result would be the
6 same: No revenue neutrality. For example, we can modify the above scenario in
7 the following way.

- 8 • Even if only one out of four “highly likely to leave” respondents actually
9 left, that would still translate to (1/4th of 29.5%) or 7.3% of customers
10 leaving.
- 11 • 7.3% of 250,000 customers would be 18,250 (leaving CenturyLink with
12 231,750 customers remaining).
- 13 • At \$40 per month, the 18,250 departing customers equate to approx.
14 \$730,000 of lost revenue monthly.
- 15 • And, as before, none of that revenue is offset by the remaining 231,750
16 customers since their additional \$2 per month does not even offset the
17 initial access reduction of \$500,000.

18

19 In summary, there may have been a time in the past when “revenue neutrality”
20 could be achieved by allowing a company like CenturyLink the flexibility to
21 adjust its retail rates. But that time has passed. As the nature of wireline
22 service—as perceived by customers—has changed, customers’ tolerance for price
23 adjustments has changed as well. Today, Pennsylvania customers display a price

1 sensitivity that indicates any potential reductions in switched access revenues
2 cannot be successfully offset by adjustments to retail rates. Simply put, the
3 communications marketplace today, and the view of “disposable” wireline calling
4 that permeates the market, makes it impossible to assume “revenue neutrality” can
5 be achieved through price adjustments alone.

6
7 **Q. WHAT ARE THE TAKE AWAY POINTS FROM THE PENNSYLVANIA -**
8 **SPECIFIC SURVEY?**

9 **A.** As stated above, the survey is intentionally very short and very “to the point”.
10 The intent of the survey was to obtain Pennsylvania-specific information
11 regarding how customers would respond to a potential rate increase. The primary
12 learning from the survey is that, for customers whose retail basic local service
13 rates are at \$18, price sensitivity to rate increases is extremely high. While the
14 survey says nothing about adjusting prices for customers whose rates may be \$10,
15 \$12, or perhaps even \$14, the survey clearly suggests that increasing rates in
16 Pennsylvania beyond an extant \$18 rate level would create significant customer
17 migration and/or disconnections, which is clearly an undesirable outcome.

18
19 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

20 **A.** Yes it does.

respid	revenue	exchange	city	state	zip	inter	intra	qs1	qs2
6	18	WYBO	WAYNESBORO	PA	17268	457	0	1	2
11	63	NWOX	NEW OXFORD	PA	17350	5046	0	1	1
15	69	CRLS	NEWVILLE	PA	17241	5046	5046	1	2
21	22	PTVL	PORTERSVILLE	PA	16051	0	0	2	2
31	64	SHIP	SHIPPENSBURG	PA	17257	5046	5046	1	1
32	18	NWOX	NEW OXFORD	PA	17350	333	333	2	2
35	24	DNCN	DUNCANNON	PA	17020	5046	5046	2	1
37	24	MCBG	MC CONNELLSBURG	PA	17233	0	0	2	2
39	55	MRCB	MERCERSBURG	PA	17236	5046	5046	1	2
49	60	MTJY	MOUNT JOY	PA	17552	5046	5046	2	2
50	30	ORBS	SHIRLEYSBURG	PA	17260	5046	5046	2	1
54	18	GNCS	GREENCASTLE	PA	17225	5102	5102	2	2
55	34	MRBG	MARTINSBURG	PA	16662	0	0	1	2
58	51	HNVR	HANOVER	PA	17331	555	444	2	1
59	24	MLHL	MILL HALL	PA	17751	288	0	2	2
62	28	FSTW	NEW PARIS	PA	15554			2	2
66	68	CHBG	CHAMBERSBURG	PA	17202	5046	5046	1	2
69	18	NWPT	NEWPORT	PA	17074	288	288	1	2
71	18	LTTW	LITTLESTOWN	PA	17340	0	0	2	1
72	63	RDVL	MILROY	PA	17063	5046	5046	1	2
74	18	HNVR	HANOVER	PA	17331	5046	5046	1	1
75	18	WYBO	FAYETTEVILLE	PA	17222	5046	0	1	1
76	50	CRLS	CARLISLE	PA	17015	5046	5046	2	1
79	22	HYND	HYNDMAN	PA	15545	5046	5046	1	2
88	27	RDVL	MILROY	PA	17063	5046	5046	1	2
90	24	CRLS	BOILING SPRINGS	PA	17007	288	0	1	1
98	82	BDFR	BEDFORD	PA	15522	5046	5046	2	2
103	60	LYBG	NEW ENTERPRISE	PA	16664	5046	5046	1	1
118	28	MCBG	FORT LITTLETON	PA	17223	288	0	2	1
120	70	CHBG	CHAMBERSBURG	PA	17202	5046	5046	1	1
122	18	NIXN	BUTLER	PA	16002	5046	5046	1	2
124	55	SLRK	SLIPPERY ROCK	PA	16057	5046	0	1	2
127	18	LTTW	LITTLESTOWN	PA	17340	0	0	1	2
131	62	MCLV	MC ALISTERVILLE	PA	17049	5046	5046	1	2
138	18	EZTW	ELIZABETHTOWN	PA	17022	5046	5046	1	1
140	30	RDVL	REEDSVILLE	PA	17084	5046	5046	2	1

142	80 HYND	HYNDMAN	PA	15545	5046	5046	2	1
145	78 FRFD	FAIRFIELD	PA	17320	5046	5046	2	2
147	18 CRLS	CARLISLE	PA	17015	0	0	2	2
154	59 WYBO	WAYNESBORO	PA	17268	5046	5046	2	2
159	30 MHSP	GARDNERS	PA	17324	5046	5046	2	1
165	79 CHBG	CHAMBERSBURG	PA	17201	5046	5046	2	1
166	55 NWOX	NEW OXFORD	PA	17350	5046	5046	2	2
170	55 EZTW	BAINBRIDGE	PA	17502	5046	5046	1	2
172	24 EWFR	MIFFLIN	PA	17058	5046	5046	2	2
173	55 WYBO	WAYNESBORO	PA	17268	5046	5046	1	1
180	71 HNVR	HANOVER	PA	17331	0	0	2	1
181	18 MHSP	GARDNERS	PA	17324	5046	5046	2	2
186	73 MRCB	MERCERSBURG	PA	17236	5046	5046	2	2
192	18 BCCK	BLANCHARD	PA	16826	5046	0	1	2
193	51 TMTW	THOMPSONTOWN	PA	17094	288	0	2	1
195	71 MRTT	MARIETTA	PA	17547	5046	0	2	2
197	55 THSP	BROAD TOP	PA	16621	5046	5046	1	2
208	32 CRLS	CARLISLE	PA	17015	5046	5046	1	2
212	24 HNVR	HANOVER	PA	17331	0	0	1	2
217	24 MTJY	MANHEIM	PA	17545	333	0	2	2
218	74 WYBO	WAYNESBORO	PA	17268	5046	5046	2	1
232	24 GNCS	GREENCASTLE	PA	17225	0	0	2	2
234	30 BTLR	BUTLER	PA	16002	5046	5046	2	1
237	18 LTTW	LITTLESTOWN	PA	17340	5102	5102	1	2
238	24 RCFD	RICHFIELD	PA	17086	5102	5102	2	1
242	24 EZTW	ELIZABETHTOWN	PA	17022	5046	0	1	2
245	50 MCLV	THOMPSONTOWN	PA	17094	5046	5046	1	2
246	30 HNVR	HANOVER	PA	17331	5046	5046	1	2
248	38 CRLS	CARLISLE	PA	17013	5046	5046	2	1
252	24 PTRY	PORT ROYAL	PA	17082	0	0	1	2
265	59 SCBG	SHELLSBURG	PA	15559	5046	5046	2	2
274	80 NVLC	NEWVILLE	PA	17241	5046	5046	2	2
276	18 MFTW	MIFFLIN	PA	17058	0	0	2	1
301	18 HNVR	HANOVER	PA	17331	5046	5046	2	2
307	18 BTLR	BUTLER	PA	16001	0	0	2	1
309	18 WYBO	WAYNESBORO	PA	17268	0	0	2	2
311	18 EVRT	EVERETT	PA	15537	5046	5046	1	2

312	18 GTBG	GETTYSBURG	PA	17325	0	0	2	2
313	53 CHBG	CHAMBERSBURG	PA	17201	432	432	1	2
317	33 BLRS	BLUE RIDGE SM	PA	17214	5046	5046	2	1
323	22 CHBG	CHAMBERSBURG	PA	17201	288	288	1	2
326	24 NWBG	NEWBURG	PA	17240	0	0	1	2
340	18 EVRT	EVERETT	PA	15537	5046	5046	2	1
342	70 SLRK	SLIPPERY ROCK	PA	16057	5046	5046	2	2
347	39 CHBG	CHAMBERSBURG	PA	17201	5046	5046	2	1
349	26 HNVR	HANOVER	PA	17331	5046	5046	2	2
358	30 GTBG	GETTYSBURG	PA	17325	284	284	1	1
360	28 NVLC	NEWVILLE	PA	17241	333	333	2	1
362	27 NWBG	NEWBURG	PA	17240	444	444	2	2
364	30 GNCS	GREENCASTLE	PA	17225	5046	5046	2	2
365	18 MRBG	MARTINSBURG	PA	16662	0	0	2	1
374	18 MCBG	MC CONNELLSBURG	PA	17233	5046	0	1	1
376	55 BLTN	MERCER	PA	16137	5046	5046	2	1
380	27 BLVL	BELLEVILLE	PA	17004	5046	5046	1	1
382	24 WYBO	WAYNESBORO	PA	17268	5046	5046	2	1
385	30 BDFR	BEDFORD	PA	15522	5046	5046	1	2
392	24 GTBG	GETTYSBURG	PA	17325	5046	5046	2	2
396	30 CHBG	CHAMBERSBURG	PA	17202	5046	5046	2	1
399	24 HNVR	HANOVER	PA	17331	5046	5046	2	1
402	82 FRFD	FAIRFIELD	PA	17320	5046	5046	2	2
414	70 LTTW	LITTLESTOWN	PA	17340	5046	5046	1	1
421	30 HWRD	HOWARD	PA	16841	5046	5046	2	1
426	18 HNVR	HANOVER	PA	17331	0	0	1	1
433	18 FYVL	FAYETTEVILLE	PA	17222	5046	5046	1	2
436	69 CRLS	CARLISLE	PA	17013	5046	5046	2	1
438	75 CHCR	CHICORA	PA	16025	5046	5046	2	1
440	18 BLIN	BLAIN	PA	17006	5102	5102	2	1
443	64 MRCB	MERCERSBURG	PA	17236	5046	5046	2	2
449	18 MHSP	MT HOLLY SPRINGS	PA	17065	288	0	1	2
452	60 LYBG	NEW ENTERPRISE	PA	16664	5046	5046	1	2
463	37 HNVR	HANOVER	PA	17331	5046	5046	2	1
471	34 NWBG	NEWBURG	PA	17240	5046	5046	2	1
474	11 BTLR	BUTLER	PA	16001	5046	5046	2	1
481	37 CHBG	CHAMBERSBURG	PA	17202	5046	5046	2	2

486	53 MRCB	MERCERSBURG	PA	17236	5046	5046	1	2
493	30 ORBS	SHIRLEYSBURG	PA	17260	5046	5046	2	2
500	22 MYVI	MARYSVILLE	PA	17053	5046	0	2	1
501	22 NBFO	SHERMANS DALE	PA	17090	5046	0	1	1
502	63 CRLS	CARLISLE	PA	17015	5046	5046	1	2
504	34 CHBG	CHAMBERSBURG	PA	17202	5046	5046	2	1
505	55 BDFR	BEDFORD	PA	15522	5046	5046	1	1
507	27 WYBO	WAYNESBORO	PA	17268	222	222	1	1
510	34 DNCN	DUNCANNON	PA	17020	5046	5046	2	1
515	18 WYBO	WAYNESBORO	PA	17268	5046	5046	1	2
526	79 MCLV	MC ALISTERVILLE	PA	17049	5046	5046	1	1
528	54 NWOX	NEW OXFORD	PA	17350	5046	5046	1	2
533	60 HPWL	HOPEWELL	PA	16650			1	1
534	74 LYSV	LOYSVILLE	PA	17047	5046	5046	1	1
538	63 MCBG	WATERFALL	PA	16689	5046	5046	1	1
541	22 HNVR	HANOVER	PA	17331	288	0	2	2
545	18 SHGP	SHADE GAP	PA	17255	5046	5046	1	2
546	55 FRFD	FAIRFIELD	PA	17320	5046	5046	1	1
550	22 CLRV	CLEARVILLE	PA	15535	0	0	2	1
557	30 MCBG	MC CONNELLSBURG	PA	17233	5046	5046	2	2
568	25 BTLR	FENELTON	PA	16034	5046	5046	2	2
571	18 BDFR	BEDFORD	PA	15522	5046	5046	2	1
574	58 CRLS	CARLISLE	PA	17015	5046	5046	2	2
577	27 LVRP	LIVERPOOL	PA	17045	5046	5046	1	1
579	51 DNCN	DUNCANNON	PA	17020	5046	5046	2	2
583	46 GTBG	GETTYSBURG	PA	17325	5046	5046	1	2
587	22 HRVL	HARRISVILLE	PA	16038	5046	0	2	1
591	63 MRRT	BAINBRIDGE	PA	17502	5046	5046	1	2
595	27 MNTW	HUNTINGDON	PA	16652	5046	5046	2	2
596	34 WYBO	WAYNESBORO	PA	17268	5046	5046	2	2
600	43 PRSP	PORTERSVILLE	PA	16051	288	288	1	2
602	18 SLRK	SLIPPERY ROCK	PA	16057	0	0	2	1
603	55 CYBG	EAST FREEDOM	PA	16637	5046	5046	2	1
605	54 CHCR	CHICORA	PA	16025	5046	5046	2	2
607	65 BIGV	BIGLERVILLE	PA	17307	5046	5046	2	2
619	18 BLVL	BELLEVILLE	PA	17004	0	0	1	2
620	30 BIGV	ORRTANNA	PA	17353	5046	5046	2	2

621	18 CNQN	RENFREW	PA	16053	222	222	1	1
630	60 HNVR	HANOVER	PA	17331	5046	5046	2	2
632	30 SHGP	SHADE GAP	PA	17255	5046	5046	2	1
633	18 MCBG	MC CONNELLSBURG	PA	17233	284	284	2	1
634	74 FSTW	NEW PARIS	PA	15554	5046	5046	2	1
637	24 HNVR	HANOVER	PA	17331	288	288	2	1
644	30 CHBG	CHAMBERSBURG	PA	17201	5046	5046	2	1
650	27 MCBG	MC CONNELLSBURG	PA	17233	5046	5046	1	2
654	80 NWOX	NEW OXFORD	PA	17350	5046	5046	2	1
657	55 CRLS	CARLISLE	PA	17013	5046	5046	2	2
658	55 MNTW	HUNTINGDON	PA	16652	5046	5046	1	1
659	55 CYBG	CLAYSBURG	PA	16625	5046	5046	2	2
664	75 EVRT	EVERETT	PA	15537	5046	5046	1	1
671	18 CRLS	CARLISLE	PA	17013	5046	0	1	2
680	38 NWPT	NEWPORT	PA	17074	5046	0	1	1
685	24 EZTW	ELIZABETHTOWN	PA	17022	5046	0	1	1
689	55 LTTW	LITTLESTOWN	PA	17340	5046	5046	2	2
692	55 NVLC	NEWVILLE	PA	17241	5046	5046	1	2
694	69 MCBG	HUSTONTOWN	PA	17229	5046	5046	2	1
716	11 MNTW	HUNTINGDON	PA	16652	333	333	2	2
720	18 WYBO	WAYNESBORO	PA	17268	555	555	1	2
727	58 BTLR	FENELTON	PA	16034	5046	5046	2	1
728	33 NVLC	NEWVILLE	PA	17241	5046	0	2	1
731	33 EZTW	ELIZABETHTOWN	PA	17022	5046	5046	2	2
733	24 MTJY	MOUNT JOY	PA	17552	5046	0	2	1
734	64 EWFR	EAST WATERFORD	PA	17021	5046	5046	2	2
735	65 HYND	HYNDMAN	PA	15545			1	2
736	18 GNCS	GREENCASTLE	PA	17225	5102	5102	2	1
741	60 HNVR	HANOVER	PA	17331	5046	5046	2	1
748	60 BIGV	BIGLERVILLE	PA	17307	5046	5046	1	2
749	38 THSP	CASSVILLE	PA	16623	0	0	2	1
754	30 CRLS	BOILING SPRINGS	PA	17007	5046	5046	1	2
763	76 HNVR	HANOVER	PA	17331	5046	0	1	2
764	27 MRCB	MERCERSBURG	PA	17236	5046	5046	1	1
769	30 STTM	SAINT THOMAS	PA	17252	5046	5046	2	1
773	30 NBFO	SHERMANS DALE	PA	17090	5046	5046	2	1
776	80 HNVR	HANOVER	PA	17331	5046	5046	2	1

779	30 GTBG	GETTYSBURG	PA	17325	5046	5046	1	2
786	70 EVCY	EVANS CITY	PA	16033	0	0	1	1
787	27 WYBO	WAYNESBORO	PA	17268	0	0	2	1
788	84 CRLS	CARLISLE BRKS	PA	17013	5046	5046	2	2
789	23 MRCB	MERCERSBURG	PA	17236	333	333	1	2
790	55 BDFR	BEDFORD	PA	15522	5046	5046	2	1
792	30 CRLS	CARLISLE	PA	17015	5046	5046	1	2
798	78 WYBO	FAYETTEVILLE	PA	17222	5046	5046	1	1
802	18 CRLS	CARLISLE	PA	17013	5046	5046	1	2
808	74 CHBG	CHAMBERSBURG	PA	17201	0	0	1	2
814	60 STTM	CHAMBERSBURG	PA	17202	5046	5046	2	1
816	58 ZION	BELLEFONTE	PA	16823	5046	5046	1	2
821	34 BTLR	BUTLER	PA	16001	5046	5046	2	1
822	55 BIGV	ARENDTSTVILLE	PA	17303	5046	5046	2	2
828	24 RDVL	MILROY	PA	17063	288	0	1	2
835	18 YRSP	ASPERS	PA	17304	5046	0	1	2
837	11 MHSP	MOUNT HOLLY SPGS	PA	17065	0	0	2	2
840	54 SCBG	SHELLSBURG	PA	15559	5046	5046	2	1
848	30 NWOX	NEW OXFORD	PA	17350	5046	5046	2	1
851	18 MRDN	BUTLER	PA	16001	5046	5046	2	1
857	33 OSBG	ALUM BANK	PA	15521	5046	5046	2	2
859	18 CHBG	CHAMBERSBURG	PA	17202	5046	5046	2	1
863	18 HNVR	HANOVER	PA	17331	288	288	1	1
869	38 CHBG	CHAMBERSBURG	PA	17201	5046	5046	2	1
873	59 MFTW	MIFFLINTOWN	PA	17059	5046	5046	1	1
876	27 FYVL	FAYETTEVILLE	PA	17222	0	0	1	1
885	28 CHBG	CHAMBERSBURG	PA	17201	0	0	2	1
887	74 NBFO	SHERMANS DALE	PA	17090	5046	5046	1	2
895	28 TMTW	THOMPSONTOWN	PA	17094	0	0	2	2
899	53 EZTW	ELIZABETHTOWN	PA	17022	5046	5046	2	2
902	78 CLMA	COLUMBIA	PA	17512	5046	5046	2	1
905	48 CRLS	CARLISLE	PA	17015	555	555	1	1
906	18 MCBG	MC CONNELLSBURG	PA	17233	5046	5046	2	1
907	64 YRSP	GARDNERS	PA	17324	5046	5046	2	1
908	65 LTTW	LITTLESTOWN	PA	17340	5046	5046	1	2
910	24 WYBO	WAYNESBORO	PA	17268	5046	5046	2	1
913	55 EZTW	ELIZABETHTOWN	PA	17022	5046	0	1	2

919	30 CHBG	CHAMBERSBURG	PA	17202	5046	0	2	2
923	78 LYBG	NEW ENTERPRISE	PA	16664	5046	5046	2	1
924	60 EVCY	EVANS CITY	PA	16033	5046	0	1	2
934	60 CRLS	DILLSBURG	PA	17019	5046	5046	2	1
937	59 BDFR	BUFFALO MILLS	PA	15534	5046	5046	2	1
938	39 CHCR	EAST BRADY	PA	16028	5046	5046	2	1
954	24 CHCR	FENELTON	PA	16034	5046	5046	2	2
958	30 THSP	SALTILLO	PA	17253	5046	5046	2	2
965	60 HYND	HYNDMAN	PA	15545			2	2
981	30 HNVR	MC SHERRYSTOWN	PA	17344	5046	5046	2	2
982	50 EVRT	EVERETT	PA	15537	5046	5046	2	2
985	33 GNCS	WAYNESBORO	PA	17268	5046	5046	1	2
989	26 BIGV	BIGLERVILLE	PA	17307	0	0	2	1
991	28 FRFD	ORRTANNA	PA	17353	0	0	1	2
1,000	63 CHBG	CHAMBERSBURG	PA	17202	5046	5046	2	2
1,003	64 NWOX	NEW OXFORD	PA	17350	5046	5046	2	1
1,007	73 SCBG	MANN'S CHOICE	PA	15550	5046	5046	2	1
1,015	18 BTLR	EAST BUTLER	PA	16029	5046	5046	2	1
1,016	18 FRFD	ORRTANNA	PA	17353	0	0	1	1
1,018	34 CLMA	COLUMBIA	PA	17512	0	0	2	2
1,028	21 CRLS	CARLISLE	PA	17015	5046	0	2	1
1,032	55 MLTW	MILLERSTOWN	PA	17062	5046	5046	2	1
1,042	18 PRKR	PARKER	PA	16049	0	0	2	1
1,049	18 CRLS	CARLISLE	PA	17015	5046	5046	2	1
1,053	24 MHSP	WILMINGTON	de	19809	5046	5046	2	1
1,055	55 WYBO	WAYNESBORO	PA	17268	5046	5046	1	2
1,060	18 MTJY	MOUNT JOY	PA	17552	222	0	1	2
1,061	34 BCCK	HOWARD	PA	16841	5046	5046	2	2
1,067	30 HPWL	HOPEWELL	PA	16650	5046	5046	1	1
1,068	24 RDVL	REEDSVILLE	PA	17084	444	444	2	1
1,085	27 NVLC	NEWVILLE	PA	17241	5046	5046	1	2
1,086	24 WYBO	MONT ALTO	PA	17237	5046	5046	1	2
1,089	68 LYSV	SHERMANS DALE	PA	17090	5046	5046	1	2
1,090	30 SHIP	SHIPPENSBURG	PA	17257	5046	5046	1	1
1,103	18 BTLR	EAST BUTLER	PA	16029	0	0	2	1
1,104	18 NWOX	NEW OXFORD	PA	17350	5046	0	1	2
1,110	35 MCLV	MC ALISTERVILLE	PA	17049	5046	5046	2	1

1,118	18 LYSV	LOYSVILLE	PA	17047	288	0	2	2
1,122	18 GTBG	GETTYSBURG	PA	17325	5046	5046	2	2
1,124	30 MTJY	MOUNT JOY	PA	17552	5046	5046	2	2
1,131	27 EVRT	EVERETT	PA	15537	0	0	2	1
1,137	60 GNCS	GREENCASTLE	PA	17225	5046	5046	2	1
1,138	30 CHBG	CHAMBERSBURG	PA	17202	5046	5046	1	1
1,139	27 SHIP	ORRSTOWN	PA	17244	5046	5046	2	1
1,140	33 STTM	CHAMBERSBURG	PA	17202	5046	5046	1	1
1,141	18 GTBG	ORRTANNA	PA	17353	432	432	1	1
1,149	18 DNCN	DUNCANNON	PA	17020	5046	5046	2	1
1,150	18 EMTN	EMLENTON	PA	16373	0	0	1	1
1,155	18 WLBG	WILLIAMSBURG	PA	16693	5046	5046	2	2
1,156	24 EZTW	ELIZABETHTOWN	PA	17022	5046	5046	1	1
1,158	24 MRBG	MARTINSBURG	PA	16662	5046	5046	1	2
1,165	24 EMTN	EMLENTON	PA	16373	5046	5046	2	2
1,172	22 CHBG	CHAMBERSBURG	PA	17202	5046	0	1	2
1,175	55 SHIP	SHIPPENSBURG	PA	17257	5046	5046	1	1
1,188	27 EMTN	EMLENTON	PA	16373	5046	5046	2	1
1,193	22 NVLC	NEWVILLE	PA	17241	432	432	2	2
1,194	18 NBFO	ELLIOTTSBURG	PA	17024	5046	0	1	2
1,201	53 CYBG	CLAYSBURG	PA	16625	5046	5046	1	2
1,206	18 CHBG	CHAMBERSBURG	PA	17202	333	333	1	2
1,212	18 ZION	BELLEFONTE	PA	16823	222	222	1	2
1,216	50 ALVL	MILL CREEK	PA	17060	5046	5046	1	2
1,217	11 LYSV	LOYSVILLE	PA	17047	5102	5102	1	1
1,218	33 CHBG	CHAMBERSBURG	PA	17201	288	0	2	1
1,220	89 VLNT	VOLANT	PA	16156	5046	5046	2	1
1,222	63 HNVR	HANOVER	PA	17331	5046	5046	2	1
1,227	27 WYBO	WAYNESBORO	PA	17268	0	0	2	1
1,231	33 WSNB	BOYERS	PA	16020	5046	5046	1	1
1,234	18 WLBG	WILLIAMSBURG	PA	16693	0	0	1	1
1,236	63 SHGP	SHADE GAP	PA	17255	5046	5046	2	1
1,240	30 MRBG	MARTINSBURG	PA	16662	5046	5046	1	2
1,245	62 PRSP	PROSPECT	PA	16052	5046	5046	2	2
1,253	41 BTLR	BUTLER	PA	16002	5046	5046	1	1
1,259	45 ALVL	BELLEVILLE	PA	17004	5102	5102	2	1
1,261	60 EVRT	EVERETT	PA	15537	5046	5046	1	2

1,262	30	CRLS	CARLISLE	PA	17013	5046	5046	2	1
1,263	53	EZTW	BAINBRIDGE	PA	17502	0	0	1	2
1,265	55	CHBG	CHAMBERSBURG	PA	17202	5046	5046	2	2
1,270	30	DYRN	CONCORD	PA	17217	5046	5046	2	2
1,272	37	WYBO	WAYNESBORO	PA	17268	5046	5046	1	1
1,274	79	BLTN	MERCER	PA	16137	5046	0	1	1
1,286	24	GNCS	GREENCASTLE	PA	17225	0	0	2	1
1,287	35	CHBG	CHAMBERSBURG	PA	17202	5046	5046	1	1
1,298	24	MFTW	MIFFLINTOWN	PA	17059	0	0	2	1
1,299	30	MLHL	MILL HALL	PA	17751	444	444	1	2
1,300	24	NVLC	NEWVILLE	PA	17241	288	288	2	2
1,302	24	CLMA	COLUMBIA	PA	17512	5046	0	1	2
1,304	33	OSBG	IMLER	PA	16655	5046	5046	2	1
1,313	18	CRLS	PLAINFIELD	PA	17081	444	444	1	2
1,320	30	MLHL	MILL HALL	PA	17751	5046	5046	2	2
1,324	30	EVRT	HOPEWELL	PA	16650	5046	5046	2	1
1,328	65	CRLS	CARLISLE	PA	17013	5046	5046	2	2
1,329	60	NWBG	NEWBURG	PA	17240	5046	5046	2	1
1,335	18	BDFR	BEDFORD	PA	15522	5046	5046	1	1
1,340	70	EZTW	BAINBRIDGE	PA	17502	222	222	1	2
1,344	34	CLRV	CLEARVILLE	PA	15535	5046	5046	1	1
1,345	24	HYND	HYNDMAN	PA	15545	5046	5046	1	2
1,348	18	NVLC	NEWVILLE	PA	17241	5046	5046	1	2
1,352	11	NWPT	NEWPORT	PA	17074	0	0	2	1
1,356	28	FYVL	FAYETTEVILLE	PA	17222	5046	5046	2	1
1,359	18	PTRL	KARNS CITY	PA	16041	5046	5046	1	1
1,360	24	HNVR	HANOVER	PA	17331	5046	5046	2	1
1,386	28	MARN	CHAMBERSBURG	PA	17202	5046	5046	2	1
1,390	50	MKBG	HESSTON	PA	16647	5046	5046	1	2
1,393	55	MCBG	FORT LITTLETON	PA	17223	5046	5046	2	1
1,394	68	PTRY	PORT ROYAL	PA	17082	5046	5046	1	2
1,396	24	RCFD	MILLERSTOWN	PA	17062	5046	0	2	1
1,404	60	WYBO	WAYNESBORO	PA	17268	5046	5046	1	2
1,405	33	MTJY	MOUNT JOY	PA	17552	0	0	1	1
1,412	29	MRCB	MERCERSBURG	PA	17236	5046	5046	2	2
1,416	59	MYVI	MARYSVILLE	PA	17053	5046	5046	1	1
1,418	27	CYBG	EAST FREEDOM	PA	16637	5046	5046	1	1

1,425	64 HNVR	GLENVILLE	PA	17329	5046	5046	2	1
1,427	34 EUCL	HILLIARDS	PA	16040	5046	5046	1	1
1,431	55 MKBG	JAMES CREEK	PA	16657	5046	5046	1	1
1,436	30 WYBO	FAYETTEVILLE	PA	17222	5046	5046	2	2
1,437	68 FRFD	FAIRFIELD	PA	17320	5046	5046	1	2
1,438	50 CLMA	COLUMBIA	PA	17512	5046	5046	2	2
1,440	34 CHBG	SCOTLAND	PA	17254	5046	5046	2	2
1,447	22 SHIP	SHIPPENSBURG	PA	17257	444	444	2	1
1,451	75 MRBG	MARTINSBURG	PA	16662	5046	5046	1	2
1,459	59 FSTW	SHELLSBURG	PA	15559	5046	5046	1	2
1,473	18 LYSV	LOYSVILLE	PA	17047	0	0	1	2
1,476	30 BDFR	BEDFORD	PA	15522	5046	5046	2	2
1,479	63 MLHL	MILL HALL	PA	17751	5046	5046	2	2
1,486	33 CHBG	CHAMBERSBURG	PA	17201	0	0	2	2
1,499	18 HNVR	HANOVER	PA	17331	5046	0	2	1
1,510	18 LYSV	LANDISBURG	PA	17040	5046	5046	1	1
1,513	55 FYVL	FAYETTEVILLE	PA	17222	5046	5046	1	2
1,518	18 LYSV	LOYSVILLE	PA	17047	0	0	1	2
1,519	24 NWSH	PETROLIA	PA	16050	5046	5046	2	2
1,520	55 PRSP	PROSPECT	PA	16052	5046	5046	2	1
1,521	63 NWPT	NEWPORT	PA	17074	0	0	2	1
1,542	60 CHBG	CHAMBERSBURG	PA	17202	5046	5046	1	2
1,546	55 MRBG	MARTINSBURG	PA	16662	5046	5046	2	1
1,550	21 EZTW	ELIZABETHTOWN	PA	17022	222	222	2	1
1,552	18 NVLC	NEWVILLE	PA	17241	5046	5046	1	2
1,560	18 MCBG	MC CONNELLSBG	PA	17233	5102	5102	1	2
1,565	34 MTJY	MOUNT JOY	PA	17552	5046	5046	2	2
1,569	18 WLBG	WILLIAMSBURG	PA	16693	5102	5102	2	2
1,575	64 FSTW	NEW PARIS	PA	15554	5046	5046	2	2
1,579	60 EZTW	ELIZABETHTOWN	PA	17022	5046	5046	1	2
1,584	59 DYRN	UPPERSTRASBURG	PA	17265	5046	5046	2	2
1,585	58 RRSP	ROARING SPRING	PA	16673	5046	5046	1	2
1,586	18 MTJY	MOUNT JOY	PA	17552	5102	5102	1	2
1,599	31 HWRD	HOWARD	PA	16841	333	333	2	1
1,602	30 WYBO	WAYNESBORO	PA	17268	5046	5046	1	2
1,610	60 FRFD	FAIRFIELD	PA	17320	5046	5046	1	2
1,611	60 MFTW	MIFFLINTOWN	PA	17059	5046	5046	2	2

1,613	78 GTBG	GETTYSBURG	PA	17325	5046	5046	1	1
1,615	30 BLVL	BELLEVILLE	PA	17004	5046	5046	1	2
1,621	55 RDVL	REEDSVILLE	PA	17084	5046	5046	2	2
1,624	37 SHIP	SHIPPENSBURG	PA	17257	5046	5046	1	1
1,628	38 BTLR	BUTLER	PA	16001	5046	5046	1	1
1,639	27 GNCS	GREENCASTLE	PA	17225	0	0	1	1
1,640	30 WYBO	WAYNESBORO	PA	17268	5046	5046	1	2
1,643	38 MRTT	MARIETTA	PA	17547	5046	5046	2	2
1,644	18 MFTW	MIFFLINTOWN	PA	17059	0	0	1	2
1,650	55 CHBG	CHAMBERSBURG	PA	17202	5046	0	1	2
1,651	30 SLRK	SLIPPERY ROCK	PA	16057	5046	5046	2	1
1,658	27 CHBG	CHAMBERSBURG	PA	17202	826	826	1	2
1,659	50 MNTW	HUNTINGDON	PA	16652	5046	5046	1	1
1,673	30 SHGP	NEELYTON	PA	17239	5046	5046	2	1
1,674	70 ALVL	ALLENSVILLE	PA	17002	0	0	1	2
1,680	78 MRBG	MARTINSBURG	PA	16662	5046	5046	1	2
1,686	33 SHGP	BURNT CABINS	PA	17215	5046	5046	2	1
1,688	24 SLRK	SLIPPERY ROCK	PA	16057	5102	5102	1	2
1,689	68 CHBG	CHAMBERSBURG	PA	17201	5046	5046	2	1
1,690	24 HNVR	MCSHERRYSTOWN	PA	17344	5438	5438	1	2
1,692	30 NBFO	ELLIOTTSBURG	PA	17024	444	444	1	1
1,697	23 NVLC	NEWVILLE	PA	17241	0	0	2	2
1,698	59 GTBG	GETTYSBURG	PA	17325	5046	5046	1	1
1,701	55 SHIP	ORRSTOWN	PA	17244	5046	5046	2	2
1,708	30 MRTT	COLUMBIA	PA	17512	5046	5046	1	1
1,712	60 SCBG	SCHELLSBURG	PA	15559	5046	5046	1	2
1,715	18 CHBG	CHAMBERSBURG	PA	17201	0	0	2	1
1,718	59 SCBG	MANNS CHOICE	PA	15550	5046	5046	1	1
1,720	25 EZTW	ELIZABETHTOWN	PA	17022	0	0	1	2
1,726	55 NWOX	NEW OXFORD	PA	17350	5046	5046	1	1
1,727	18 EZTW	ELIZABETHTOWN	PA	17022	0	0	2	2
1,735	36 FRFD	FAIRFIELD	PA	17320	5438	5438	1	2
1,740	27 HNVR	HANOVER	PA	17331	5046	5046	2	1
1,744	18 MRBG	MARTINSBURG	PA	16662	5046	5046	2	2
1,751	30 CNQN	EVANS CITY	PA	16033	5046	5046	2	2
1,752	59 GNCS	GREENCASTLE	PA	17225	5046	5046	1	2
1,753	18 STTM	FORT LOUDON	PA	17224	5046	5046	2	1

1,758	68 NWBG	SHIPPENSBURG	PA	17257	5046	5046	1	2
1,760	34 SHIP	SHIPPENSBURG	PA	17257	5046	5046	1	2
1,761	18 NWPT	NEWPORT	PA	17074	5046	5046	2	2
1,763	74 WYBO	WAYNESBORO	PA	17268	5046	5046	1	2
1,764	33 BDFR	BEDFORD	PA	15522	333	333	2	2
1,766	27 ORBS	ORBISONIA	PA	17243	0	0	2	1
1,769	30 BDVY	BEDFORD	PA	15522	5046	5046	2	1
1,776	24 VLNT	VOLANT	PA	16156	5046	5046	1	1
1,777	18 RRSP	ROARING SPRING	PA	16673	288	0	2	1
1,784	63 CLMA	COLUMBIA	PA	17512	5046	5046	1	1
1,785	34 HYND	BUFFALO MILLS	PA	15534	5046	5046	2	2
1,786	18 WYBO	GREENCASTLE	PA	17225	5102	5102	1	1
1,789	24 CRLS	CARLISLE	PA	17015	284	284	1	2
1,792	50 CHBG	CHAMBERSBURG	PA	17202	5046	5046	1	2
1,797	34 NWOX	NEW OXFORD	PA	17350	5046	5046	2	1
1,803	33 BDFR	BEDFORD	PA	15522	5046	5046	2	1
1,811	38 BTLR	BUTLER	PA	16001	5046	5046	2	1
1,812	24 NBFO	NEWPORT	PA	17074	5046	5046	2	2
1,814	30 HNVR	HANOVER	PA	17331	288	288	1	2
1,820	30 BTLR	BUTLER	PA	16001	5046	0	1	2
1,822	28 MFTW	MIFFLIN	PA	17058	5046	5046	1	1
1,828	78 MRCB	MERCERSBURG	PA	17236	5046	5046	2	1
1,832	63 HPWL	HOPEWELL	PA	16650	5046	5046	2	2
1,846	24 EWFR	MIFFLIN	PA	17058	0	0	1	2
1,852	24 SHIP	SHIPPENSBURG	PA	17257	5046	5046	1	1
1,854	24 RDVL	MILROY	PA	17063	0	0	2	1
1,855	55 SLRK	SLIPPERY ROCK	PA	16057	5046	5046	1	2
1,859	18 CRLS	CARLISLE	PA	17013	0	0	2	1
1,862	33 BCCK	BEECH CREEK	PA	16822	0	0	2	2
1,872	24 GNCS	WAYNESBORO	PA	17268	5046	0	1	2
1,873	33 WYBO	WAYNESBORO	PA	17268	5046	5046	2	2
1,881	55 RDVL	REEDSVILLE	PA	17084	5046	5046	2	1
1,882	34 GTBG	GETTYSBURG	PA	17325	5046	5046	2	2
1,892	43 WYBO	WAYNESBORO	PA	17268	0	0	2	2
1,894	49 EVCY	EVANS CITY	PA	16033	5046	5046	1	1
1,895	38 HNVR	HANOVER	PA	17331	5046	5046	1	1
1,898	70 STTM	FORT LOUDON	PA	17224	5046	5046	2	1

1,899	55 STTM	CHAMBERSBURG	PA	17202	5046	5046	1	2
1,900	50 EZTW	ELIZABETHTOWN	PA	17022	5046	5046	2	1
1,913	55 SHIP	SHIPPENSBURG	PA	17257	5046	5046	2	1
1,914	38 LTTW	LITTLESTOWN	PA	17340	5046	5046	1	1
1,915	18 HRVL	HARRISVILLE	PA	16038	5046	5046	2	1
1,918	24 CRLS	CARLISLE	PA	17013	444	444	2	1
1,924	22 BTLR	BUTLER	PA	16001	288	288	2	1
1,931	59 LTTW	LITTLESTOWN	PA	17340	5046	5046	1	2
1,934	18 GNCS	GREENCASTLE	PA	17225	444	444	1	2
1,940	18 EZTW	ELIZABETHTOWN	PA	17022	649	649	2	1
1,941	18 CHBG	CHAMBERSBURG	PA	17202	5046	5046	2	1
1,944	96 MTVL	MOUNTVILLE	PA	17554	5046	5046	2	1
1,947	55 WLBG	WILLIAMSBURG	PA	16693	5046	5046	1	2
1,950	30 WYBO	WAYNESBORO	PA	17268	5046	5046	2	2
1,958	59 HNVR	HANOVER	PA	17331	5046	5046	1	1
1,960	18 BTLR	BUTLER	PA	16001	5046	5046	1	2
1,971	64 CHBG	CHAMBERSBURG	PA	17202	5046	5046	1	1
1,975	33 BDFR	BEDFORD	PA	15522	5046	5046	2	2
1,980	24 NBFO	NEW BLOOMFIELD	PA	17068	222	222	2	2
1,985	60 MRBG	MARTINSBURG	PA	16662	5046	5046	2	1
1,986	75 THSP	THREE SPRINGS	PA	17264	5046	5046	1	1
1,987	60 GTBG	GETTYSBURG	PA	17325	5046	5046	2	2
1,994	18 MARN	CHAMBERSBURG	PA	17202	5046	0	1	2
2,004	30 NVLC	SHIPPENSBURG	PA	17257	5046	5046	1	1
2,008	55 CRLS	CARLISLE	PA	17015	5046	5046	2	1
2,012	18 BCCK	BLANCHARD	PA	16826	0	0	2	1
2,013	60 WLBG	HOLLIDAYSBURG	PA	16648	5046	5046	1	2
2,015	64 BDVY	BEDFORD	PA	15522	5046	5046	2	1
2,016	65 FRFD	FAIRFIELD	PA	17320	5046	5046	2	1
2,018	54 MRTT	MAYTOWN	PA	17550	5046	5046	2	2
2,021	73 FSTW	ALUM BANK	PA	15521	5046	5046	1	1
2,022	27 HNVR	HANOVER	PA	17331	752	0	2	2
2,023	18 WYBO	WAYNESBORO	PA	17268	0	0	2	1
2,028	37 MRCB	MERCERSBURG	PA	17236	5046	5046	2	1
2,034	18 CRLS	CARLISLE	PA	17013	5046	5046	2	1
2,038	18 CHBG	CHAMBERSBURG	PA	17201	0	0	2	1
2,044	18 MRDN	BUTLER	PA	16001	5046	0	1	1

2,045	37	CHBG	CHAMBERSBURG	PA	17202	288	288	2	1
2,048	24	FRFD	GETTYSBURG	PA	17325	5046	5046	2	1
2,049	24	CRLS	CARLISLE	PA	17013	5046	0	1	2
2,050	28	LTTW	LITTLESTOWN	PA	17340	0	0	1	2
2,051	60	MFTW	MIFFLINTOWN	PA	17059	5046	5046	1	2
2,053	18	LVRP	LIVERPOOL	PA	17045	5046	5046	2	1
2,055	18	HNVR	HANOVER	PA	17331	5046	5046	1	2
2,066	73	MRTT	BAINBRIDGE	PA	17502	5046	5046	2	2
2,072	55	SHIP	SHIPPENSBURG	PA	17257	5046	5046	2	1
2,073	67	LTTW	LITTLESTOWN	PA	17340	5046	5046	2	2
2,089	38	THSP	THREE SPRINGS	PA	17264	333	333	1	2
2,090	78	MCBG	MC CONNELLSBURG	PA	17233	5046	5046	2	2
2,093	18	WYBO	WAYNESBORO	PA	17268	5046	5046	2	2
2,096	34	CHBG	CHAMBERSBURG	PA	17201	5046	0	2	2
2,098	18	THSP	WATERFALL	PA	16689	288	0	1	1
2,101	72	LTTW	LITTLESTOWN	PA	17340	5046	5046	2	2
2,107	18	CRLS	BOILING SPRINGS	PA	17007	0	0	2	1
2,110	83	BTLR	BUTLER	PA	16001	222	222	1	2
2,112	18	SLRK	SLIPPERY ROCK	PA	16057	5046	5046	1	2
2,113	63	FRFD	FAIRFIELD	PA	17320	5046	5046	2	2
2,115	24	HNVR	HANOVER	PA	17331	5046	5046	2	2
2,119	30	STTM	SAINT THOMAS	PA	17252	5046	5046	2	1
2,127	59	HNVR	HANOVER	PA	17331	5046	5046	1	2
2,128	55	EZTW	ELIZABETHTOWN	PA	17022	5046	5046	2	2
2,129	27	BTLR	BUTLER	PA	16001	5046	5046	1	1
2,135	30	HNVR	HANOVER	PA	17331	5046	5046	2	2
2,138	30	HPWL	SAXTON	PA	16678	5046	5046	1	1
2,150	55	GNCS	GREENCASTLE	PA	17225	5046	5046	1	2
2,160	34	RCFD	RICHFIELD	PA	17086	5046	5046	1	2
2,183	34	BDFR	BEDFORD	PA	15522	5046	5046	2	1
2,184	18	EZTW	ELIZABETHTOWN	PA	17022	0	0	2	1
2,186	60	CRLS	CARLISLE	PA	17015	5046	5046	1	1
2,193	34	CYBG	SPROUL	PA	16682	5046	5046	2	2
2,195	18	MCBG	MC CONNELLSBG	PA	17233	0	0	2	2
2,197	18	WSNB	WEST SUNBURY	PA	16061	0	0	2	1
2,207	64	WSNB	SLIPPERY ROCK	PA	16057	5046	5046	1	1
2,210	64	BIGV	BIGLERVILLE	PA	17307	5046	5046	2	1

2,213	55 MRBG	MARTINSBURG	PA	16662	5046	5046	1	2
2,220	18 STTM	SAINT THOMAS	PA	17252	5046	5046	1	1
2,226	50 HNVR	HANOVER	PA	17331	5046	0	1	2
2,228	34 SHGP	BURNT CABINS	PA	17215	5046	5046	1	2
2,237	24 MCBG	MCCONNELLSBURG	PA	17233	288	288	2	1
2,238	55 MTJY	MOUNT JOY	PA	17552	5046	5046	1	2
2,240	75 MHSP	CARLISLE	PA	17015	5046	5046	1	2
2,248	18 EZTW	ELIZABETHTOWN	PA	17022	444	5046	2	2
2,257	27 MFTW	MIFFLIN	PA	17058	288	288	1	2
2,261	24 MTJY	MOUNT JOY	PA	17552	5046	5046	2	1
2,263	58 NVLC	SHIPPENSBURG	PA	17257	5046	5046	2	2
2,271	22 SHIP	SHIPPENSBURG	PA	17257	0	0	2	1
2,280	18 NWBG	SHIPPENSBURG	PA	17257	288	288	1	2
2,284	55 THSP	BROAD TOP	PA	16621	5046	5046	2	2
2,288	30 WYBO	WAYNESBORO	PA	17268	5046	5046	2	2
2,289	55 EZTW	ELIZABETHTOWN	PA	17022	5046	5046	2	2
2,292	30 OSBG	IMLER	PA	16655	5046	5046	2	2
2,298	24 RDVL	MILROY	PA	17063	5046	5046	1	2
2,301	30 BIGV	BIGLERVILLE	PA	17307	5046	5046	1	1
2,308	18 CRLS	CARLISLE	PA	17015	5046	0	2	2
2,314	54 MRBG	WILLIAMSBURG	PA	16693	5046	5046	2	1
2,318	74 ICBG	ELLIOTTSBURG	PA	17024	5046	5046	2	2
2,322	60 RCFD	RICHFIELD	PA	17086	5046	5046	1	1
2,323	30 MNTW	HUNTINGDON	PA	16652	5046	5046	2	1
2,325	64 GNCS	STATE LINE	PA	17263	5046	5046	2	2
2,326	64 HNVR	GLENVILLE	PA	17329	5046	5046	2	1
2,328	30 RDVL	MILROY	PA	17063	5046	5046	1	1
2,338	64 BIGV	ARENDSVILLE	PA	17303	5046	5046	1	2
2,339	30 BTLR	BUTLER	PA	16001	5046	5046	2	1
2,343	33 NIXN	VALENCIA	PA	16059	5046	5046	2	1
2,351	63 MLHL	MILL HALL	PA	17751	5046	5046	2	1
2,353	59 SHIP	SHIPPENSBURG	PA	17257	5046	5046	1	1
2,355	18 HNVR	HANOVER	PA	17331	222	222	2	1
2,357	33 BIGV	ASPERS	PA	17304	5046	5046	1	1
2,358	55 CLVL	BEDFORD	PA	15522			2	1
2,359	94 BIGV	GARDNERS	PA	17324	5046	5046	1	2
2,364	55 MYVI	MARYSVILLE	PA	17053	5046	5046	1	2

2,366	55 EZTW	ELIZABETHTOWN	PA	17022	5046	5046	1	2
2,376	18 SHIP	SHIPPENSBURG	PA	17257	0	0	1	2
2,383	58 MFTW	PORT ROYAL	PA	17082	5046	0	2	2
2,384	18 FSTW	ALUM BANK	PA	15521	0	0	2	1
2,385	18 MYVI	MARYSVILLE	PA	17053	0	0	2	1
2,390	34 WYBO	WAYNESBORO	PA	17268	5046	0	1	1
2,391	37 DYRN	SPRING RUN	PA	17262	5046	5046	2	2
2,392	27 EZTW	ELIZABETHTOWN	PA	17022	284	284	1	1
2,393	55 MFTW	MIFFLINTOWN	PA	17059	5046	5046	2	1
2,395	27 DYRN	DRY RUN	PA	17220	5046	5046	1	1
2,408	27 EMTN	EMLENTON	PA	16373	288	288	2	1
2,425	24 HNVR	HANOVER	PA	17331	288	0	1	1
2,429	55 ZION	BELLEFONTE	PA	16823	0	0	1	2
2,432	33 CHBG	CHAMBERSBURG	PA	17201	5046	0	1	1
2,442	78 EMTN	EMLENTON	PA	16373	5046	5046	2	1
2,444	65 LTTW	LITTLESTOWN	PA	17340	5046	5046	1	1
2,445	18 CRLS	CARLISLE BRKS	PA	17013	0	0	1	1
2,453	30 MRCB	MERCERSBURG	PA	17236	5046	5046	1	2
2,461	50 MTVL	MOUNTVILLE	PA	17554	5046	5046	2	2
2,465	28 NWOX	NEW OXFORD	PA	17350	5046	5046	2	1
2,467	34 PAGV	SLIPPERY ROCK	PA	16057	5046	5046	2	1
2,468	50 VLNT	VOLANT	PA	16156	5046	5046	2	2
2,473	33 HRVL	HARRISVILLE	PA	16038	0	0	2	2
2,476	18 CHBG	CHAMBERSBURG	PA	17201	333	333	2	1
2,479	11 NBFO	SHERMANS DALE	PA	17090	5046	5046	2	1
2,480	78 GTBG	GETTYSBURG	PA	17325	5046	5046	1	1
2,482	54 EZTW	ELIZABETHTOWN	PA	17022	5046	5046	2	1
2,483	27 BTLR	BUTLER	PA	16001	222	222	1	1
2,486	18 MLHL	MILL HALL	PA	17751	288	288	1	1
2,496	63 GNCS	GREENCASTLE	PA	17225	5046	5046	2	2
2,500	87 NWBG	NEWBURG	PA	17240	5046	5046	1	2
2,509	70 CRLS	CARLISLE	PA	17015	5046	5046	1	1
2,512	75 WLBG	WILLIAMSBURG	PA	16693	5046	5046	2	1
2,519	55 YRSP	GETTYSBURG	PA	17325	5046	5046	1	1
2,520	36 THSP	CASSVILLE	PA	16623	5046	5046	2	2
2,525	35 EUCL	EAU CLAIRE	PA	16030	5046	5046	2	1
2,526	18 LYBG	NEW ENTERPRISE	PA	16664	5102	5102	1	2

2,530	18 CHBG	SHIPPENSBURG	PA	17257	5046	5046	1	1
2,531	24 MLHL	MILL HALL	PA	17751	0	0	2	1
2,542	60 MTJY	MOUNT JOY	PA	17552	5046	5046	1	2
2,551	60 MTJY	MOUNT JOY	PA	17552	5046	5046	2	2
2,552	63 SHIP	ORRSTOWN	PA	17244	5046	5046	1	1
2,554	28 MFTW	MIFFLIN	PA	17058	0	0	2	2
2,563	70 LTTW	LITTLESTOWN	PA	17340	5046	5046	2	2
2,565	79 EZTW	ELIZABETHTOWN	PA	17022	5046	5046	1	2
2,568	34 BDFR	BEDFORD	PA	15522	5046	5046	1	2
2,571	18 BDFR	BEDFORD	PA	15522	5102	5102	1	2
2,577	60 WYBO	WAYNESBORO	PA	17268	5046	5046	1	2
2,579	60 NBFO	SHERMANS DALE	PA	17090	5046	5046	2	2
2,582	24 MTVL	MOUNTVILLE	PA	17554	288	0	1	2
2,590	26 ICBG	NEWPORT	PA	17074	0	0	2	2
2,593	18 LVRP	LIVERPOOL	PA	17045	5046	5046	2	1
2,599	50 MTJY	MOUNT JOY	PA	17552	5046	5046	1	2
2,608	63 CRLS	CARLISLE	PA	17013	5046	5046	2	2
2,612	24 BTLR	BUTLER	PA	16001	5046	5046	2	1
2,613	55 CLMA	COLUMBIA	PA	17512	5046	5046	2	2
2,615	24 MTJY	MOUNT JOY	PA	17552	0	0	1	2
2,629	50 CLVL	BEDFORD	PA	15522			2	1
2,632	50 MFTW	MIFFLINTOWN	PA	17059	5046	5046	1	2
2,640	30 NVLC	NEWVILLE	PA	17241	0	0	1	1
2,641	30 MRCB	MERCERSBURG	PA	17236	5046	5046	1	2
2,643	22 DNCN	DUNCANNON	PA	17020	5046	5046	1	1
2,646	30 MHSP	MT HOLLY SPGS	PA	17065	5046	5046	2	1
2,655	30 MFTW	MIFFLINTOWN	PA	17059	432	432	1	1
2,659	30 ICBG	MILLERSTOWN	PA	17062	5046	5046	1	1
2,660	18 EZTW	ELIZABETHTOWN	PA	17022	5046	5046	2	1
2,675	60 MLTW	MILLERSTOWN	PA	17062	5046	5046	2	2
2,676	58 FSTW	NEW PARIS	PA	15554	5046	5046	2	1
2,682	34 HYND	BUFFALO MILLS	PA	15534	5046	5046	2	2
2,689	64 FRFD	ORRTANNA	PA	17353	0	0	2	1
2,693	18 CLMA	COLUMBIA	PA	17512	5046	0	2	2
2,697	70 LYSV	ELLIOTTSBURG	PA	17024	5046	5046	1	2
2,703	18 BTLR	BUTLER	PA	16001	0	0	2	1
2,708	60 PAGV	VOLANT	PA	16156	5046	5046	2	2

2,709	32 STTM	FORT LOUDON	PA	17224	444	444	1	2
2,713	52 MLTW	MILLERSTOWN	PA	17062	5046	5046	2	2
2,715	55 CLRV	CLEARVILLE	PA	15535	5046	5046	1	1
2,719	55 CHBG	CHAMBERSBURG	PA	17202	5046	0	1	2
2,720	30 MCBG	MC CONNELLSBURG	PA	17233	5046	5046	2	1
2,721	18 GTBG	GETTYSBURG	PA	17325	0	0	2	1
2,725	65 MTVL	MOUNTVILLE	PA	17554	5046	5046	2	2
2,737	0 SCBG	SCHELLSBURG	PA	15559	0	0	1	2
2,741	64 CRLS	CARLISLE	PA	17013	5046	5046	1	2
2,755	54 EVRT	EVERETT	PA	15537	5046	5046	1	2
2,761	69 MCBG	HUSTONTOWN	PA	17229	5046	5046	2	2
2,764	65 RDVL	REEDSVILLE	PA	17084	5046	5046	1	2
2,768	18 EZTW	ELIZABETHTOWN	PA	17022	5046	5046	2	1
2,771	18 GTBG	GETTYSBURG	PA	17325	0	0	2	2
2,797	73 NIXN	RENFREW	PA	16053	5046	5046	2	2
2,799	28 PTVL	PROSPECT	PA	16052	5046	5046	2	1
2,801	24 BTLR	BUTLER	PA	16001	0	0	2	1
2,804	27 HNVR	HANOVER	PA	17331	5102	5102	2	1
2,805	28 ZION	BELLEFONTE	PA	16823	288	0	1	2
2,807	55 GNCS	GREENCASTLE	PA	17225	5046	5046	2	2
2,822	34 EVCY	EVANS CITY	PA	16033	5046	5046	1	2
2,827	59 HNVR	HANOVER	PA	17331	5046	5046	2	2
2,832	18 SHIP	ORRSTOWN	PA	17244	444	444	2	2
2,842	53 BIGV	BENDERSVILLE	PA	17306	5046	5046	2	1
2,844	59 MTVL	MOUNTVILLE	PA	17554	5046	5046	1	2
2,845	67 EVRT	EVERETT	PA	15537	5046	5046	1	2
2,850	30 NWOX	NEW OXFORD	PA	17350	5046	5046	2	1
2,851	50 NBFO	SHERMANS DALE	PA	17090	5046	0	1	2
2,852	22 CHBG	CHAMBERSBURG	PA	17201	0	0	2	1
2,854	77 NWOX	NEW OXFORD	PA	17350	5046	0	1	2
2,859	30 NVLC	NEWVILLE	PA	17241	5046	5046	2	1
2,860	18 CRLS	CARLISLE	PA	17015	0	0	2	2
2,861	18 MHSP	MT HOLLY SPGS	PA	17065	0	0	2	2
2,869	27 SHIP	SHIPPENSBURG	PA	17257	5046	0	2	2
2,873	79 SLRK	SLIPPERY ROCK	PA	16057	5046	5046	2	2
2,877	53 BLVL	BELLEVILLE	PA	17004	5046	5046	1	1
2,882	33 HPWL	HOPEWELL	PA	16650	5046	5046	2	1

2,883	70 CRLS	CARLISLE BKS	PA	17013	5046	5046	2	1
2,889	18 BTLR	BUTLER	PA	16002	5046	5046	2	2
2,891	79 RRSP	ROARING SPRING	PA	16673	5046	5046	2	2
2,893	24 FXBG	FOXBURG	PA	16036	288	0	2	1
2,895	70 NVLC	NEWVILLE	PA	17241	5046	5046	2	1
2,896	38 BDFR	BEDFORD	PA	15522	5046	5046	2	2
2,909	30 CHBG	CHAMBERSBURG	PA	17202	5046	5046	1	1
2,917	75 ZION	BELLEFONTE	PA	16823	0	0	2	1
2,924	30 CRLS	CARLISLE	PA	17013	5046	5046	1	1
2,925	60 FSTW	NEW PARIS	PA	15554	5046	5046	1	2
2,929	18 MARN	GREENCASTLE	PA	17225	555	555	1	2
2,931	49 HNVR	HANOVER	PA	17331	5046	5046	1	1
2,933	60 WSNB	BUTLER	PA	16001	5046	5046	1	1
2,940	55 MLHL	MILL HALL	PA	17751	5046	5046	1	1
2,948	55 FXBG	ST PETERSBURG	PA	16054	5046	5046	1	2
2,952	18 MFTW	MIFFLINTOWN	PA	17059	5046	0	2	1
2,957	60 STTM	CHAMBERSBURG	PA	17202	5046	5046	1	1
2,961	24 FRFD	FAIRFIELD	PA	17320	288	288	1	2
2,963	70 NWPT	NEWPORT	PA	17074	0	0	2	2
2,965	18 DNCN	DUNCANNON	PA	17020	5046	5046	2	2
2,975	60 EVRT	EVERETT	PA	15537	5046	5046	2	1
2,976	56 GTBG	GETTYSBURG	PA	17325	5046	5046	1	2
2,977	41 WYBO	WAYNESBORO	PA	17268	5046	5046	1	2
2,985	77 GNCS	GREENCASTLE	PA	17225	5046	5046	1	2
2,990	55 SHIP	SHIPPENSBURG	PA	17257	5046	5046	2	1
2,997	41 HPWL	SIX MILE RUN	PA	16679			1	2
3,013	18 CRLS	CARLISLE	PA	17013	5046	0	1	1
3,015	18 MFTW	MIFFLIN	PA	17058	5046	5046	2	2
3,017	55 BIGV	BIGLERVILLE	PA	17307	5046	5046	1	1
3,024	24 CHBG	CHAMBERSBURG	PA	17201	5046	5046	2	1
3,025	30 GNCS	WAYNESBORO	PA	17268	5046	5046	2	2
3,026	35 STTM	CHAMBERSBURG	PA	17202	5046	5046	1	1
3,027	63 GNCS	WAYNESBORO	PA	17268	5046	5046	2	1
3,031	33 LTTW	HANOVER	PA	17331	5046	5046	2	2
3,038	24 SHIP	SHIPPENSBURG	PA	17257	5046	0	2	1
3,040	68 FRFD	FAIRFIELD	PA	17320	5046	5046	2	2
3,041	55 RRSP	ROARING SPRING	PA	16673	5046	0	2	2

3,047	44 EZTW	ELIZABETHTOWN	PA	17022	5046	5046	1	2
3,048	58 SHIP	SHIPPENSBURG	PA	17257	5046	5046	2	2
3,052	60 EMTN	EMLENTON	PA	16373	5046	5046	2	1
3,055	18 MCLV	MC ALISTERVILLE	PA	17049	5102	5102	1	1
3,057	34 NVLC	NEWVILLE	PA	17241	5046	5046	2	1
3,061	60 HNVR	HANOVER	PA	17331	5046	5046	2	1
3,062	24 BLRS	BLUE RIDGE SUMM	it	17214	5046	5046	2	1
3,064	18 CRLS	MECHANICSBURG	PA	17055	333	333	1	1
3,066	30 PTVL	PORTERSVILLE	PA	16051	5046	5046	2	2
3,069	65 CHBG	CHAMBERSBURG	PA	17201	5046	5046	1	2
3,079	50 HNVR	HANOVER	PA	17331	5046	5046	2	1
3,082	34 NBFO	SHERMANS DALE	PA	17090	5046	5046	2	1
3,091	54 MNTW	HUNTINGDON	PA	16652	5046	5046	2	2
3,104	30 CLMA	COLUMBIA	PA	17512	5046	0	2	1
3,111	18 MCLV	PT ROYAL	PA	17082	0	0	2	1
3,114	42 BIGV	ASPERS	PA	17304	0	0	2	1
3,115	33 SHIP	ORRSTOWN	PA	17244	5046	0	1	1
3,120	50 EZTW	ELIZABETHTOWN	PA	17022	5046	5046	2	2
3,124	49 CRLS	CARLISLE	PA	17015	5046	5046	2	2
3,129	18 CHBG	CHAMBERSBURG	PA	17202	0	0	2	2
3,131	55 NVLC	NEWVILLE	PA	17241	5046	5046	1	1
3,132	18 CRLS	CARLISLE	PA	17013	288	288	1	1
3,133	31 TMTW	MIFFLINTOWN	PA	17059	5046	5046	2	2
3,137	35 YRSP	GARDNERS	PA	17324	444	444	1	1
3,142	30 GTBG	GETTYSBURG	PA	17325	5046	5046	1	1
3,147	18 MTJY	MOUNT JOY	PA	17552	5046	5046	1	2
3,152	18 GNCS	GREENCASTLE	PA	17225	0	0	2	1
3,167	58 HNVR	HANOVER	PA	17331	5046	5046	2	1
3,172	18 SHGP	SHADE GAP	PA	17255	5046	5046	2	2
3,174	24 HNVR	HANOVER	PA	17331	5046	0	2	2
3,180	59 WYBO	WAYNESBORO	PA	17268	5046	5046	2	1
3,188	30 SHIP	UPPERSTRASBURG	PA	17265	5046	5046	2	2
3,205	24 EVCY	CALLERY	PA	16024	5046	5046	2	1
3,209	18 LYSV	LOYSVILLE	PA	17047	5046	0	1	1
3,210	58 GNCS	GREENCASTLE	PA	17225	5046	5046	1	2
3,213	30 RCFD	MILLERSTOWN	PA	17062	5046	5046	2	1
3,216	78 NWOX	NEW OXFORD	PA	17350	5046	5046	2	2

3,230	27 RRSP	NEW ENTERPRISE	PA	16664	288	288	1	2
3,232	75 HNVR	HANOVER	PA	17331	5046	5046	1	2
3,238	60 CRLS	CARLISLE	PA	17013	5046	5046	1	1
3,239	18 EMTN	EMLENTON	PA	16373	5102	5102	2	1
3,243	35 MHSP	GARDNERS	PA	17324	5046	5046	2	1
3,246	38 FRFD	FAIRFIELD	PA	17320	5046	5046	2	2
3,251	33 EVRT	EVERETT	PA	15537	5046	5046	1	1
3,254	70 MRTT	BAINBRIDGE	PA	17502	5046	5046	1	2
3,262	50 CHBG	SCOTLAND	PA	17254	5046	0	1	2
3,275	24 CRLS	CARLISLE	PA	17013	5046	5046	2	2
3,278	18 TMTW	THOMPSONTOWN	PA	17094	6112	6112	2	1
3,290	79 CRLS	CARLISLE	PA	17013	5046	5046	2	1
3,298	53 EZTW	MIDDLETOWN	PA	17057	5046	5046	1	2
3,313	68 EZTW	ELIZABETHTOWN	PA	17022	5046	5046	2	2
3,319	55 EZTW	ELIZABETHTOWN	PA	17022	5046	5046	2	2
3,334	22 MHSP	MT HOLLY SPGS	PA	17065	5046	5046	2	2
3,340	30 GTBG	GETTYSBURG	PA	17325	5046	5046	2	1
3,350	57 FXBG	ST PETERSBURG	PA	16054	5046	5046	2	1
3,353	38 LVRP	LIVERPOOL	PA	17045	5046	5046	2	2
3,366	18 GTBG	GETTYSBURG	PA	17325	288	0	1	2
3,367	24 NBFO	SHERMANS DALE	PA	17090	0	0	2	1
3,368	18 NBFO	NEW BLOOMFIELD	PA	17068	0	0	2	1
3,374	63 BTLR	BUTLER	PA	16001	5046	5046	2	1
3,375	74 FRFD	FAIRFIELD	PA	17320	5046	5046	2	2
3,377	68 MTJY	MOUNT JOY	PA	17552	0	0	2	1
3,379	24 BDVY	BEDFORD	PA	15522	5046	5046	1	2
3,380	18 BCCK	BEECH CREEK	PA	16822	5046	5046	1	1
3,384	55 MHSP	MT HOLLY SPGS	PA	17065	5046	0	1	1
3,385	60 LTTW	LITTLESTOWN	PA	17340	5046	5046	2	1
3,386	70 FRFD	FAIRFIELD	PA	17320	5046	5046	2	1
3,387	36 RRSP	ROARING SPRING	PA	16673	5046	5046	1	1
3,390	37 EZTW	ELIZABETHTOWN	PA	17022	5046	5046	1	1
3,395	18 NVLC	NEWVILLE	PA	17241	5046	5046	2	1
3,403	31 BIGV	BIGLERVILLE	PA	17307	5046	5046	2	1
3,414	18 CLMA	COLUMBIA	PA	17512	0	0	2	1
3,417	58 CRLS	CARLISLE	PA	17015	5046	5046	2	2
3,420	55 YRSP	YORK SPRINGS	PA	17372	5046	5046	2	2

3,432	30	LYSV	LANDISBURG	PA	17040	5046	5046	2	1
3,436	34	MLTW	MILLERSTOWN	PA	17062	5046	5046	1	2
3,437	55	ZION	HOWARD	PA	16841	5046	5046	2	1
3,441	21	CRLS	CARLISLE	PA	17013	5046	0	2	1
3,442	60	GTBG	GETTYSBURG	PA	17325	5046	5046	1	1
3,444	48	CLMA	MOUNT JOY	PA	17552	0	0	1	1
3,448	18	WYBO	WAYNESBORO	PA	17268	0	0	1	2
3,451	65	CYBG	CLAYSBURG	PA	16625	5046	5046	1	2
3,453	30	NVLC	NEWVILLE	PA	17241	5046	5046	2	2
3,459	36	ZION	HOWARD	PA	16841	0	0	2	2
3,465	64	EZTW	ELIZABETHTOWN	PA	17022	5046	5046	2	2
3,483	34	STTM	GREENCASTLE	PA	17225	5046	5046	1	1
3,488	34	MRDN	RENFREW	PA	16053	288	5046	2	1
3,494	24	MFTW	MIFFLINTOWN	PA	17059	5046	5046	2	2
3,500	18	MRCB	MERCERSBURG	PA	17236	5102	5102	2	1
3,503	74	GTBG	GETTYSBURG	PA	17325	5046	5046	1	2
3,506	41	NWOX	NEW OXFORD	PA	17350	826	826	1	2
3,507	24	MTVL	COLUMBIA	PA	17512	5046	0	2	1
3,513	60	SLRK	SLIPPERY ROCK	PA	16057	5046	5046	2	2
3,516	63	LTTW	LITTLESTOWN	PA	17340	288	0	1	2
3,528	33	WYBO	WAYNESBORO	PA	17268	5046	5046	1	1
3,530	18	BTLR	FENELTON	PA	16034	0	0	2	2
3,531	70	MTVL	LANCASTER	PA	17601	5046	5046	1	1
3,545	18	EZTW	ELIZABETHTOWN	PA	17022	222	222	2	2
3,556	30	NWOX	NEW OXFORD	PA	17350	5046	5046	2	1
3,567	60	HNVR	HANOVER	PA	17331	5046	5046	2	2
3,568	35	CRLS	BOILING SPRINGS	PA	17007	5046	5046	1	1
3,582	34	GTBG	GETTYSBURG	PA	17325	5046	5046	2	1
3,588	50	GTBG	GETTYSBURG	PA	17325	5046	0	1	2
3,589	59	WYBO	WAYNESBORO	PA	17268	5046	5046	2	1
3,590	18	CRLS	CARLISLE	PA	17013	5046	0	2	1
3,593	64	HNVR	MC SHERRYSTOWN	PA	17344	5046	5046	2	2
3,597	36	EZTW	ELIZABETHTOWN	PA	17022	5046	5046	2	2
3,609	55	MFTW	MIFFLINTOWN	PA	17059	5046	5046	1	2

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	47			8	8	1	8			
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5	5	6	7	2	0	3	2	5		1
5	6	8		1	0	6	2	5		2
5	6	7	8	1	0	2	2	2	3	-6
				2	0	6	2	5		3
1	1	10		4	0	5	2	5		1
5	7			2	0	4	2	5		-6
8				2	0	6	2	5		2
5	5	5	5	2	0	4	2	5		3
2	5	5	6	5	0	5	2	5		-6
5	6			2	0	6	2	5		-6
5	10			5	0	6	2	5		2
				2	0	4	2	5		4
1	3	3	3	2	0	6	2	5		1
8				2	4	3	2	5		3
1	1	2	5	2	2	3	2	5		3

3	5	7	8	2	0	5	2	5	-6
3	3	5	10	2	0	4	2	5	5
7	8			-6		-6	-6		-6
5	5	5	5	1	0	6	2	5	1
1	1	6	8	4	0	4	2	5	1
6	7	9		2	0	4	2	5	1
2				2	2	6	2	5	1
2				2	0	4	2	5	5
2	3	6	8	2	0	5	2	5	3
1	1	1	1	2	0	6	2	5	2
10				5	0	6	2	5	1
				4	0	6	2	5	2
5	5			3	0	5	2	5	3
9				2	0	-6	2	5	-6
6	8			3	0	4	2	5	4
3				2	1	3	2	5	3
1	1	1	1	1	0	6	2	5	3
5	7	7	7	2	3	2	2	5	3
				2	0	6	2	5	-6
5	5	5	5	2	0	5	2	5	6
				2	1	5	2	5	2
				5	0	6	2	5	-6
1	1	1	1	4	0	5	2	5	4
3	6			2	3	3	2	5	6
1	1	2	2	-6		-6	-6		-6
10				2	1	3	2	5	1
7	8			1	0	4	2	5	3
1	1	1	1	4	0	3	2	5	4
2	2	2	2	4	0	4	2	5	2
2				5	0	6	2	5	-6
8				1	0	3	2	5	2
				4	0	6	2	5	2
5	5	7	10	2	0	5	2	5	2
3	4	5	5	4	0	5	2	5	-6
1	5	8		5	0	6	2	5	1
6				2	0	6	2	5	2
1	1	1	1	2	2	2	2	5	2

5	10			1	0	2	2	5	-6
10				2	0	5	2	5	4
3	3	3	3	5	0	6	2	5	1
1	1	5	6	5	0	6	2	5	-6
1	1	1	1	1	0	4	2	5	1
8				2	0	5	2	5	5
5	7			2	0	5	2	5	4
8				1	0	4	2	5	1
				4	0	6	2	5	-6
7	8			2	1	4	2	5	4
3	3	4	4	2	2	3	2	5	4
2	2	2	2	1	0	4	2	5	1
				5	0	6	2	5	-6
5				2	0	5	2	5	5
5	5	5	5	5	0	6	2	5	1
8				2	0	6	2	5	7
5	7			2	4	3	1		3
1	1	1	1	2	0	5	2	5	3
				2	0	5	2	5	6
1	1	1	1	2	0	4	2	5	-6
8				1	0	3	2	5	4
1				2	1	2	2	5	3
6				2	1	4	2	5	4
5				2	1	3	2	5	-6
2	2	8		1	0	3	2	5	1
6	10			2	3	2	2	5	2
4	4	4	4	2	3	3	2	5	6
8				5	0	4	2	1	3
5	5	5		2	0	6	2	5	3
2	9			4	0	5	2	5	3
1	1	1	1	5	0	6	2	5	-6
				2	0	4	2	5	4
1	8			2	0	6	2	5	1
5	8			2	0	6	2	5	2

Exhibit BKS-3

Variable Information

Variable	Position	Label	Measurement Level	Column Width	Alignment	Print Format	Write Format
respid	1	Respondent id	Scale	11	Right	F11	F11
revenue	2	Revenue	Scale	11	Right	F11	F11
exchange	3	Exchange	Nominal	5	Left	A10	A10
city	4	City	Nominal	16	Left	A20	A20
state	5	State	Nominal	9	Left	A2	A2
zip	6	Zip Code	Scale	11	Right	F5	F5
inter	7	Inter	Nominal	11	Right	F15	F15
intra	8	Intra	Nominal	11	Right	F15	F15
qs1	9	QS1. Gender	Nominal	11	Right	F3	F3
qs2	10	QS2. What role do you play when it comes to choosing telecommunications services and providers for your household such as telephone and Internet service? Would you say you: ?	Nominal	11	Right	F3	F3
qs3_1	11	QS3_1. Have you or has anyone in your immediate family ever worked for any of the following: A company in the Telecommunications, Internet or Cable or Satellite Television Industry?	Nominal	11	Right	F3	F3
qs3_2	12	QS3_2. Have you or has anyone in your immediate family ever worked for any of the following: An Advertising Agency?	Nominal	11	Right	F3	F3
qs3_3	13	QS3_3. Have you or has anyone in your immediate family ever worked for any of the following: A Market Research or Marketing Consulting Firm?	Nominal	11	Right	F3	F3
qs4_1	14	QS4_1. Which of the following services does your household currently subscribe to that are NOT paid for by an employer? : Local telephone service using a traditional in-home landline	Nominal	11	Right	F3	F3
qs4_2	15	QS4_2. Which of the following services does your household currently subscribe to that are NOT paid for by an employer? : Long distance telephone service using a traditional in-home landline	Nominal	11	Right	F3	F3
qs4_3	16	QS4_3. Which of the following services does your household currently subscribe to that are NOT paid for by an employer? : A wireless or mobile telephone service	Nominal	11	Right	F3	F3
qs4_4	17	QS4_4. Which of the following services does your household currently subscribe to that are NOT paid for by an employer? : An online service or Internet access service	Nominal	11	Right	F3	F3
qs4_5	18	QS4_5. Which of the following services does your household currently subscribe to that are NOT paid for by an employer? : Cable television service	Nominal	11	Right	F3	F3
		QS4_6. Which of the following services does					

Exhibit BKS-3

qs4_6	19	your household currently subscribe to that are NOT paid for by an employer? : Satellite television service	Nominal	11	Right	F3	F3
qs4a	20	QS4A. Is your Internet connection HIGH-SPEED, or not?	Nominal	11	Right	F3	F3
qs5	21	QS5. What company provides your LOCAL HOME telephone service?	Nominal	11	Right	F3	F3
q1	22	Q1. And what company provides your PRIMARY WIRELESS OR CELLULAR TELEPHONE SERVICE?	Nominal	22	Right	F3	F3
q2	23	Q2. And what company provides your CABLE OR SATELLITE TELEVISION SERVICE?	Nominal	22	Right	F3	F3
q3	24	Q3. And what company provides your HIGH-SPEED INTERNET SERVICE?	Nominal	22	Right	F3	F3
q4	25	Q4. What is your overall level of SATISFACTION with products and service from (EMBARQ/CENTURYLINK)?	Nominal	11	Right	F3	F3
q5	26	Q5. If the situation arose, how likely would you be to RECOMMEND (EMBARQ/CENTURYLINK) SERVICE to a friend or business colleague?	Nominal	11	Right	F3	F3
q6	27	Q6. If you had a choice, over the next 6 months, how likely would you be to CONTINUE with (EMBARQ/CENTURYLINK)?	Nominal	11	Right	F3	F3
q7	28	Q7. Using a scale from 1 to 10, where a 10 means a VERY GOOD VALUE FOR THE MONEY and a 1 means a VERY POOR VALUE, how would you rate (EMBARQ/CENTURYLINK) in terms of its value for the money?	Nominal	11	Right	F3	F3
q8a_1	29	Q8A_1. If your TELEPHONE SERVICE were to INCREASE by \$2, how likely would you be to CANCEL your home telephone service and USE your WIRELESS OR MOBILE TELEPHONE SERVICE for ALL your LOCAL CALLING NEEDS?	Nominal	11	Right	F3	F3
q8a_2	30	Q8A_2. If your TELEPHONE SERVICE were to INCREASE by \$3, how likely would you be to CANCEL your home telephone service and USE your WIRELESS OR MOBILE TELEPHONE SERVICE for ALL your LOCAL CALLING NEEDS?	Nominal	11	Right	F3	F3
q8a_3	31	Q8A_3. If your TELEPHONE SERVICE were to INCREASE by \$4, how likely would you be to CANCEL your home telephone service and USE your WIRELESS OR MOBILE TELEPHONE SERVICE for ALL your LOCAL CALLING NEEDS?	Nominal	11	Right	F3	F3
q8a_4	32	Q8A_4. If your TELEPHONE SERVICE were to INCREASE by \$5, how likely would you be to CANCEL your home telephone service and USE your WIRELESS OR MOBILE TELEPHONE SERVICE for ALL your LOCAL CALLING NEEDS?	Nominal	11	Right	F3	F3

q8b_1	33	Q8B_1. And if your TELEPHONE SERVICE were to INCREASE by \$2 per MONTH, how likely would you be to SWITCH to another provider for your HOME TELEPHONE SERVICE?	Nominal	11	Right	F3	F3
q8b_2	34	Q8B_2. And if your TELEPHONE SERVICE were to INCREASE by \$3 per MONTH, how likely would you be to SWITCH to another provider for your HOME TELEPHONE SERVICE?	Nominal	11	Right	F3	F3
q8b_3	35	Q8B_3. And if your TELEPHONE SERVICE were to INCREASE by \$4 per MONTH, how likely would you be to SWITCH to another provider for your HOME TELEPHONE SERVICE?	Nominal	11	Right	F3	F3
q8b_4	36	Q8B_4. And if your TELEPHONE SERVICE were to INCREASE by \$5 per MONTH, how likely would you be to SWITCH to another provider for your HOME TELEPHONE SERVICE?	Nominal	11	Right	F3	F3
qc1	37	QC1. What is your current marital status?	Nominal	22	Right	F3	F3
qc2	38	QC2. How many children 17 years of age or younger currently live in your household?	Nominal	22	Right	F3	F3
qc3	39	QC3. I am going to read you a list of age groups. Please stop me when I reach the age group that you personally fit into.	Nominal	22	Right	F3	F3
qc4	40	QC4. Are you of Hispanic or Latino descent or origin?	Nominal	22	Right	F3	F3
qc5.1a	41	QC5. How do you describe yourself?	Nominal	22	Right	F3	F3
qc5.2a	42	QC5. How do you describe yourself?	Nominal	21	Right	F3	F3
qc6	43	QC6. What is your household's total annual income from all sources before taxes?	Nominal	22	Right	F3	F3
Variables in the working file							

Variable Values

Value		Label
qs1	1	MALE HEAD OF HOUSEHOLD
	2	FEMALE HEAD OF HOUSEHOLD
qs2	1	Make the decision yourself
	2	Share the decision with another member of your household
	3	Are not involved in the decision
qs3_1	-7	Don't know
	1	YES
	2	NO
qs3_2	-7	Don't know
	1	YES
	2	NO
	-7	Don't know

Exhibit BKS-3

qs3_3	1	YES
	2	NO
qs4_1	1	YES
	2	NO
qs4_2	1	YES
	2	NO
qs4_3	1	YES
	2	NO
qs4_4	1	YES
	2	NO
qs4_5	1	YES
	2	NO
qs4_6	1	YES
	2	NO
qs4a	1	YES, HIGH-SPEED
	2	NO
qs5	-7	Don't know
	1	EMBARQ
	2	CENTURYLINK
	3	OTHER
	1	ALLO
	2	ARMSTRONG CABLE
	3	BRIGHTHOUSE
	4	BRISTOL VIRGINIA UTILITIES
	5	BUCKEYE CABLE
	6	SUDDENLINK (FORMERLY CEBRIDGE)
	7	CHARTER
	8	CITY OF LEBANON
	9	COMCAST
	10	COMMUNICOM
	11	COX
	12	DOYLESTOWN TELEPHONE
	13	FIDELITY
	14	GURENSEY CABLE TV SYSTEM
	15	HANCOCK
16	HARGRAY	
17	INSIGHT	
18	MASSILLON CABLE	
19	MEDIACOM	
20	NEX-TECH	
21	NORTHLAND CABLE TV	

Exhibit BKS-3

q1	22	PATRIOT MEDIA
	23	SBC TELECOM
	24	SKT
	25	SPRINT
	26	TIME-WARNER CABLE
	27	ALLTEL
	28	AT&T
	29	CELLULAR ONE
	30	CINGULAR
	31	MCI/MCI WORLDCOM
	32	NEXTEL
	33	SPRINT PCS
	34	T-MOBILE
	35	TRACFONE
	36	US CELLULAR
	37	VERIZON
	38	VIRGIN MOBILE
	39	VOICESTREAM
	40	MISC. TELEPHONE COMPANIES
	41	MISC. WIRELESS / CELLULAR COMPANIES
	42	MISC. CABLE / SATELLITE COMPANIES
	43	MISC. INTERNET RESPONSES
	44	OTHER RESPONSES
	45	DISH
	46	ADELPHIA CABLE
	47	DIRECTV
	48	AOL
	49	EMBARQ
	55	BRISTOL TENNESSEE ESSENTIAL SERVICES
	56	PEOPLEPC
	57	CENTURYTEL
	58	CENTURYLINK
	59	US CABLE CORPORATION
	60	BRESNAN COMMUNICATIONS
	61	RITTER COMMUNICATIONS
	62	WEST ALABAMA TV CABLE
	63	WHITE COUNTY CABLE
	64	ALLEGIANCE COMMUNICATIONS
	65	CABLE AMERICA
	66	NEWWAVE COMMUNICATIONS
	67	ST. JOSEPH CABLEVISION

Exhibit BKS-3

	68	SJOBERG
	499	DON'T KNOW
q2	1	ALLO
	2	ARMSTRONG CABLE
	3	BRIGHTHOUSE
	4	BRISTOL VIRGINIA UTILITIES
	5	BUCKEYE CABLE
	6	SUDDENLINK (FORMERLY CEBRIDGE)
	7	CHARTER
	8	CITY OF LEBANON
	9	COMCAST
	10	COMMUNICOM
	11	COX
	12	DOYLESTOWN TELEPHONE
	13	FIDELITY
	14	GURENSEY CABLE TV SYSTEM
	15	HANCOCK
	16	HARGRAY
	17	INSIGHT
	18	MASSILLON CABLE
	19	MEDIACOM
	20	NEX-TECH
	21	NORTHLAND CABLE TV
	22	PATRIOT MEDIA
	23	SBC TELECOM
	24	SKT
	25	SPRINT
	26	TIME-WARNER CABLE
	27	ALLTEL
	28	AT&T
	29	CELLULAR ONE
	30	CINGULAR
	31	MCI/MCI WORLDCOM
	32	NEXTEL
	33	SPRINT PCS
	34	T-MOBILE
	35	TRACFONE
	36	US CELLULAR
	37	VERIZON
	38	VIRGIN MOBILE
	39	VOICESTREAM

Exhibit BKS-3

40	MISC. TELEPHONE COMPANIES
41	MISC. WIRELESS / CELLULAR COMPANIES
42	MISC. CABLE / SATELLITE COMPANIES
43	MISC. INTERNET RESPONSES
44	OTHER RESPONSES
45	DISH
46	ADELPHIA CABLE
47	DIRECTV
48	AOL
49	EMBARQ
55	BRISTOL TENNESSEE ESSENTIAL SERVICES
56	PEOPLEPC
57	CENTURYTEL
58	CENTURYLINK
59	US CABLE CORPORATION
60	BRESNAN COMMUNICATIONS
61	RITTER COMMUNICATIONS
62	WEST ALABAMA TV CABLE
63	WHITE COUNTY CABLE
64	ALLEGIANCE COMMUNICATIONS
65	CABLE AMERICA
66	NEWWAVE COMMUNICATIONS
67	ST. JOSEPH CABLEVISION
68	SJOBERG
499	DON'T KNOW
1	ALLO
2	ARMSTRONG CABLE
3	BRIGHTHOUSE
4	BRISTOL VIRGINIA UTILITIES
5	BUCKEYE CABLE
6	SUDDENLINK (FORMERLY CEBRIDGE)
7	CHARTER
8	CITY OF LEBANON
9	COMCAST
10	COMMUNICOM
11	COX
12	DOYLESTOWN TELEPHONE
13	FIDELITY
14	GURENSEY CABLE TV SYSTEM
15	HANCOCK
16	HARGRAY

Exhibit BKS-3

q3	17	INSIGHT
	18	MASSILLON CABLE
	19	MEDIACOM
	20	NEX-TECH
	21	NORTHLAND CABLE TV
	22	PATRIOT MEDIA
	23	SBC TELECOM
	24	SKT
	25	SPRINT
	26	TIME-WARNER CABLE
	27	ALLTEL
	28	AT&T
	29	CELLULAR ONE
	30	CINGULAR
	31	MCI/MCI WORLDCOM
	32	NEXTEL
	33	SPRINT PCS
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	48	AOL
	49	EMBARQ
	55	BRISTOL TENNESSEE ESSENTIAL SERVICES
	56	PEOPLEPC
	57	CENTURYTEL
	58	CENTURYLINK
	59	US CABLE CORPORATION
	60	BRESNAN COMMUNICATIONS
	61	RITTER COMMUNICATIONS
	62	WEST ALABAMA TV CABLE

Exhibit BKS-3

	63	WHITE COUNTY CABLE
	64	ALLEGIANCE COMMUNICATIONS
	65	CABLE AMERICA
	66	NEWWAVE COMMUNICATIONS
	67	ST. JOSEPH CABLEVISION
	68	SJOBERG
	499	DON'T KNOW
q4	-7	Don't know
q5	-7	Don't know
q6	-7	Don't know
q7	-7	Don't know
qc1	-6	Refused
	1	Single, meaning never married
	2	Married
	3	Living with someone
	4	Separated or divorced
5	Widowed	
qc2	-6	Refused
qc3	-6	Refused
	1	Under 21
	2	21 to 34
	3	35 to 44
	4	45 to 54
	5	55 to 64
6	65 or over	
qc4	-6	Refused
	1	YES
	2	NO
qc5.1a	-6	Refused
	1	American Indian or Alaskan Native
	2	Asian
	3	Black or African American
	4	Native Hawaiian or other Pacific Islander
	5	White
6	Other	
qc5.2a	-6	Refused
	1	American Indian or Alaskan Native
	2	Asian
	3	Black or African American
	4	Native Hawaiian or other Pacific Islander
5	White	

Exhibit BKS-3

qc6	6	Other
	-6	Refused
	1	Less than \$20,000
	2	From \$20,000 to just under \$30,000
	3	From 30 to just under \$50,000
	4	From 50 to just under \$75,000
	5	From 75 to just under \$100,000
	6	From 100 to just under \$150,000
	7	\$150,000 or more

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Investigation Regarding Intrastate :
Access Charges and IntraLATA Toll :
Rates of Rural Carriers and :
The Pennsylvania Universal :
Service Fund :

Docket No. I-00040105

RECEIVED

APR 20 2010

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

AT&T Communications of :
Pennsylvania, LLC :
Complainant :

v. :

Docket Nos. C-2009-2098380, *et al.*

Armstrong Telephone Company - :
Pennsylvania, et al. :
Respondents :

DIRECT TESTIMONY OF

DAVID F. BONSIK

**ON BEHALF OF
THE UNITED TELEPHONE COMPANY OF PENNSYLVANIA LLC D/B/A
CENTURYLINK**

STATEMENT 3.0

*4/15/10
Wlog-JK*

**** PUBLIC VERSION ****

January 20, 2010

1 I. **INTRODUCTION**

2 Q. **PLEASE STATE YOUR NAME AND YOUR BUSINESS ADDRESS.**

3 A. My name is David F. Bonsick. My office is located at 240 N. Third Street,
4 Suite 201, Harrisburg, Pennsylvania, 17101.

5

6 Q. **BY WHOM ARE YOU EMPLOYED AND WHAT IS YOUR POSITION?**

7 A. I am employed by Embarq Management Company d/b/a CenturyLink as the State
8 Executive for Pennsylvania and New Jersey.

9

10 Q. **ON WHOSE BEHALF ARE YOU TESTIFYING IN THIS PROCEEDING?**

11 A. I am testifying on behalf of The United Telephone Company of Pennsylvania
12 LLC d/b/a CenturyLink (f/d/b/a Embarq Pennsylvania), hereinafter referred to as
13 CenturyLink.

14

15 Q. **PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND, WORK
16 EXPERIENCE AND PRESENT RESPONSIBILITIES.**

17 A. I have been employed with CenturyLink and its predecessor companies, Embarq
18 and Sprint, since April 2002 when I became the company's Director of
19 Government and Public Affairs for Pennsylvania and New Jersey. In 2008, I was
20 named State Executive for Pennsylvania and New Jersey. I am now responsible
21 for managing CenturyLink's legislative, regulatory and public affairs activities in
22 the two states. I previously served as a staff assistant to U.S. Senator Arlen
23 Specter from 1989 until 1991. In 1991, I joined the Pennsylvania Rural Electric

1 Association where I held a variety of government and regulatory affairs positions
2 over a nearly 10-year period. From 2001 until April 2002, I served as Director of
3 Technology Investment with the Pennsylvania Department of Community and
4 Economic Development. I earned a bachelor's degree in political science from
5 Lycoming College in 1989.

6
7 **Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY?**

8 **A.** Yes. I most recently submitted testimony and testified on behalf of the United
9 Telephone Company of New Jersey, Inc. at Docket No. TX08090830 concerning
10 United New Jersey's intrastate switched access rates. In 2009, I submitted
11 testimony and testified on behalf of The United Telephone Company of
12 Pennsylvania, Inc. d/b/a Embarq and Embarq Communications Inc. seeking all
13 approvals required under Chapter 11 of the Pennsylvania Public Utility Code
14 relative to the parent-level merger regarding CenturyTel Inc. and Embarq
15 Corporation.

16
17 **Q. WAS YOUR TESTIMONY PREPARED BY YOU OR PREPARED UNDER**
18 **YOUR DIRECT SUPERVISION AND CONTROL?**

19 **A.** Yes.

20
21 **Q. WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY?**

22 **A.** I address the access reform and local rate rebalancing measures undertaken by the
23 Commission to date, highlighting the extent to which CenturyLink and, to the

1 extent available, the other rural local exchange carriers (“RLECs”) have already
2 implemented access rate reform in Pennsylvania. CenturyLink remains an
3 important instrument to the implementation of this Commission’s public policies
4 in high-cost rural Pennsylvania.

5
6 My Direct Testimony also addresses relevant Pennsylvania statutes – namely,
7 Sections 3017(a) and 1309 of the Pennsylvania Public Utility Code – and how
8 these statutory provisions impact the issues and the determinations in this
9 proceeding. As to Section 3017, I will address why this statutory provision
10 prohibits the Commission from reducing the access rates of companies like
11 CenturyLink without providing a viable means of revenue-neutral recovery. As to
12 Section 1309 and the retroactive implementation of access reductions, I will
13 demonstrate that statute’s thresholds of have not been satisfied. Moreover, I
14 address the reasons why applying Section 1309 to this proceeding is ill-advised.

15
16 **II. PENNSYLVANIA ACCESS REFORM – A MEASURED, PRO-**
17 **CONSUMER APPROACH**

18 **Q. CAN YOU PLEASE PROVIDE A HISTORY OF ACCESS CHARGE**
19 **REFORM IN PENNSYLVANIA?**

20 **A.** Yes. Essentially, two phases of access reform have been undertaken in
21 Pennsylvania for the RLECs (including CenturyLink). The Commission has also
22 undertaken access reform for the Verizon ILEC companies (Verizon PA and
23 Verizon North). First, the *Global Order* issued by the Commission in 1999

1 addressed access reductions for both the Verizon companies and for the RLECs
2 (including CenturyLink). At that time, CenturyLink's intrastate switched access
3 rate was reduced to \$0.12 per minute from \$0.15 per minute (for a two-ended call
4 in CenturyLink's territory). The *Global Order* set residential rate caps at \$16.00,
5 among other matters.

6
7 Furthermore, the Commission in *Global Order* indicated that it would undertake
8 further access reform, within an established a time frame, thus setting the stage
9 for a second intrastate switched access rate investigation. Specifically, on
10 October 24, 2001, the Commission issued a Secretarial Letter directing the
11 RLECs to submit a proposal for further access reform. As a result of this
12 directive, Pennsylvania's RLECs, including CenturyLink (then known as
13 Sprint/United), and other parties including AT&T, MCI and the public
14 advocates/statutory parties, submitted to the Commission a Joint Access
15 Settlement Proposal in December 2002. By Order entered July 15, 2003, the
16 Commission approved the settlement. Thus, in 2003, the Commission further
17 reduced CenturyLink's intrastate access rate to the current level of \$0.10 per
18 minute (for a two-ended call in CenturyLink's territory). Also, as a result of this
19 2003 settlement, the cap on basic residential local rates was increased to its
20 current level of \$18.00. However, this second phase of access reform only
21 impacted the RLECs, not Verizon (the ILEC).

22 In the *Global Order*, the Commission also established the Pennsylvania Universal
23 Service Fund ("PaUSF" or "PA USF") as a means to reduce access and toll rates

1 for the ultimate benefit of end-users and to preserve the affordability of local
2 service rates. Pennsylvania's USF is actually a pass-through mechanism between
3 telephone companies to equalize the revenue deficits occasioned by mandated
4 decreases in RLECs' toll and access charges. As the Commission in the *Global*
5 *Order* stated:

6 The USF is a means to reduce access and toll rates for the ultimate benefit of
7 the end-user and to encourage greater toll competition, while enabling
8 carriers to continue to preserve the affordability of local service rates.

9 Although it is referred to as a fund, it is actually a passthrough mechanism
10 to facilitate the transition from a monopoly environment to a competitive
11 environment -- an exchange of revenue between telephone companies which
12 attempts to equalize the revenue deficits occasioned by mandated decreases
13 in their toll and access charges. For purposes of this Order, the word "fund"
14 actually refers specifically to the amount of money that equals the net
15 revenue deficit resulting from revenue neutral rate structure and rebalancing
16 changes of the companies.¹

17
18 **Q. WHAT HAS BEEN THE ACCESS REFORM UNDERTAKEN BY THE**
19 **VERIZON COMPANIES IN PENNSYLVANIA?**

20 **A.** The Verizon companies have undertaken limited access reductions. There have
21 been some significant differences between Verizon and the RLECs that are worth
22 mentioning due to Verizon's position in this proceeding that the intrastate
23 switched access rates of CenturyLink and the other RLECs should mirror
24 Verizon's intrastate switched access rates. First, as previously mentioned, the

¹ *Global Order* at page 135.

1 access rates for both the RLECs and Verizon were reduced as a result of the
2 *Global Order*. However, whereas in December 2002, the RLECs put forth their
3 Joint Access Proposal to further reduce intrastate switched access rates as
4 envisioned the Commission's *Global Order* (i.e., the second phase of access
5 reform for the RLECs), Verizon's "second" round of intrastate access rate
6 reductions merely resulted from the 1999 Commission Order approving the Bell
7 Atlantic/GTE merger. Specifically, in its 1999 merger approval Order the
8 Commission required that the intrastate switched access rates of GTE (Verizon
9 North) be reduced to parity with the intrastate switched access rate of Bell's ILEC
10 affiliated, Verizon PA. This reduction was not implemented by Verizon until
11 February 2005, a full six years after it was ordered by the Commission. In my
12 view, therefore, the Commission has already implemented greater access reform
13 for the RLECs than for Verizon. Verizon's second round of access reductions
14 was simply the result of the Commission's preexisting merger approval Order.
15 Furthermore, it must be noted that while the stay in this generic investigation was
16 ultimately lifted resulting in this current consolidated generic/complaint
17 proceeding impacting the RLECs. Verizon's request for a further stay regarding
18 its intrastate switched access rates still remains pending before the Commission.

1 **Q. HAS THE COMMISSION SUCCEEDED IN ACHIEVING A BALANCED**
2 **APPROACH TO ACCESS REFORM RELATIVE TO THE RLECS?**

3 **A.** Yes, the Commission has successfully and deliberately achieved a proper balance
4 between policies designed to foster competition and the basic public policy tenets
5 of reliable, affordable, universally-available local telephone service. The
6 Commission has significantly reduced RLEC intrastate access rates while
7 ensuring that the necessary revenues would be available – through the creation of
8 the PaUSF and measured increases to the retail rates consumers pay for basic
9 local telephone service. Indeed, competition – particularly in rural town centers
10 like Gettysburg Hanover, Fayetteville⁶ and Bedford – has developed and shows
11 no sign of decreasing notwithstanding existing intrastate switched access rate
12 levels.

13

14 **Q. CAN YOU GENERALLY COMPARE THE COMMISSION'S HISTORIC**
15 **APPROACH TO ACCESS REFORM TO WHAT IS BEING REQUESTED**
16 **BY AT&T, SPRINT, VERIZON AND COMCAST IN THIS**
17 **PROCEEDING?**

18 **A.** Yes, I can. The Commission has taken a measured, pro-consumer approach to
19 access reform that has struck a proper balance between the marketplace and
20 Pennsylvania's consumers, especially those living in rural, high-cost areas of the
21 Commonwealth. In stark contrast, the proposals put forth in this proceeding by
22 AT&T, Sprint, Verizon and Comcast seek to decimate the Commission's existing
23 policies by drastically reducing the support necessary for CenturyLink and

1 Pennsylvania's other RLECs that bring affordable and reliable
2 telecommunications services to all Pennsylvania consumers. The current
3 switched access rates charged by CenturyLink to carriers help provide much-
4 needed stability in the retail rates charged to consumers for the provisioning of
5 local telephone service, while the "reforms" being advocated by AT&T, Sprint
6 and others seek to strip away these important consumer benefits in exchange for
7 what will amount to nothing more than a corporate benefit for these very large,
8 national companies. The approach being taken by these parties can only be
9 described as reckless -- harming the Commonwealth's most vulnerable rural
10 consumers, as addressed in CenturyLink's Panel Direct Testimony. Their
11 proposals are inconsistent with the deliberate and measured reform undertaken by
12 the Commission to date.

13
14 **Q. DO THESE CARRIERS IN THEIR CLAIMS OR IN THE RESULTS**
15 **THEY SEEK RECOGNIZE THE ROLE OF THE PA USF?**

16 **A.** No, not at all.

17
18 **Q. WHAT ROLE HAS THE PA USF PLAYED RELATIVE TO ACCESS**
19 **REFORM?**

20 **A.** The PaUSF has played a critical role the Commission's development of public
21 policy in rural Pennsylvania -- areas which are increasingly subject to competitive
22 pressure due in many areas. The Commission is commended for both *what* it has
23 done and for *how* it fashioned policy and balanced the interests of carriers and

1 consumers in rural high-cost Pennsylvania. The USF has allowed the
2 Commission to reduce access rates charged by CenturyLink and other RLECs,
3 while protecting Pennsylvania's consumers from the otherwise significant rate
4 increases that would have been necessary to cover the cost of such access rate
5 reductions. The Commission's history of access reform in Pennsylvania and its
6 fashioning of the public policies to date have been effective *because* they have
7 required competitive carriers to share the funding burden through the PA USF to
8 ensure that all Pennsylvanians in rural and high-cost areas have access to high-
9 quality telecommunications services. This same balanced approach needs to be
10 taken in this proceeding.

11
12 **Q. HAS THE ROLE OF THE PA USF RELATIVE TO ACCESS REFORM**
13 **INCREASED OR DECREASED SINCE THE GLOBAL ORDER?**

14 **A.** The importance of the PaUSF has increased. The PaUSF is absolutely critical –
15 as it has been in the past – to any additional access reform that may be
16 implemented by the Commission. The competitive market is intense in the more
17 dense areas, namely within small town centers, in CenturyLink's Pennsylvania
18 service territories. This is evidenced by the fact that from 2005 to June of 2009
19 CenturyLink lost over **BEGIN CTL CONFIDENTIAL** [REDACTED]

20 [REDACTED]. **END CTL CONFIDENTIAL**

21 Due to the policies of universal service and as a result of Carrier of Last Resort
22 ("COLR") obligations – regulatory mandates that neither AT&T, Sprint, Verizon
23 (non-ILEC affiliates) or Comcast have in Pennsylvania – CenturyLink is at a

1 competitive disadvantage relative to other carriers and entities in CenturyLink's
2 service territories, as Messrs. Lindsey and Harper further address. CenturyLink
3 must continue to invest in its local network to be able to provide service to all
4 consumers throughout our entire service territory, while today our competitors
5 pick and choose the most profitable areas and customers in which to offer service.
6

7 **Q. WHAT DO YOU MEAN BY AN INTENSE COMPETITIVE MARKET IN**
8 **THE MORE POPULATED RURAL TOWN CENTERS IN**
9 **CENTURYLINK'S SERVICE TERRITORY?**

10 **A.** CenturyLink serves all or part of 25 counties in Pennsylvania, with 22 of those
11 counties designated as rural according to the United States Census Bureau.
12 Within CenturyLink's rural and high-cost territory, there are more populated town
13 centers which have become prime targets for competitive entrants. For example,
14 in the exchanges of Gettysburg, Hanover, Fayetteville and Bedford alone,
15 CenturyLink lost a total of **BEGIN CTL CONFIDENTIAL** XXXXXXXXXX
16 **END CTL CONFIDENTIAL** over the three month period from July 2009
17 through September 2009.²

² As of September 30, 2009, CenturyLink's total residential and business line count were 281,377.

1 **Q. SHOULD THE PA USF PLAY A ROLE IN ANY FUTURE ACCESS**
2 **REFORM?**

3 **A.** Yes. If the Commission decides to further reduce RLEC intrastate switched
4 access rates (a result which CenturyLink submits is not necessary or advisable),
5 then the PA USF must continue to play a critical role in access reform, if any, to
6 be undertaken by the Commission. Continuation and expansion in terms of
7 receipts from the PA USF is necessary to any continued access reform.

8
9 **Q. IS CONTINUATION AND EXPANSION OF THE PA USF RELATIVE TO**
10 **ADDITIONAL ACCESS REDUCTIONS A VIABLE OPTION FOR THE**
11 **COMMISSION?**

12 **A.** It is the only viable option given Section 3017(a) of the Pennsylvania Public
13 Utility Code, as addressed below. However, from a procedural standpoint, the
14 Commission's December 10, 2009 Order limited the scope of this proceeding. If
15 the Commission determines it is just and reasonable to undertake additional
16 access reductions as a result of this proceeding, then before it implements any
17 such reductions it should allow for development of an evidentiary record to
18 determine how best to continue and expand the PA USF consistent with prior
19 Commission access reform and consonant with universal service and COLR
20 policies for high-cost rural areas in Pennsylvania. In addition, such an evidentiary
21 opportunity to investigate these issues as they relate to any additional intrastate
22 switched access reductions could be appropriately timed to capture outcomes
23 from recent activity in the federal arena (as addressed by Messrs. Lindsey and

1 Harper). In this manner, consumers and Pennsylvania do not lose out relative to
2 the interplay between the recent federal activity and the Commission's continued
3 implementation of holistic regulatory policies.

4
5 **Q. THE COMMISSION IN ITS DECEMBER 10, 2009 ORDER INDICATED**
6 **THAT A RULEMAKING MAY BE IMPLMENTED RELATIVE TO THE**
7 **PA USF. HAVE YOU READ THE COMMISSION'S DECEMBER 10, 2009**
8 **ORDER?**

9 **A.** Yes, I have.

10
11 **Q. DO YOU HAVE ANY CONCERNS WITH THIS APPROACH GIVEN THE**
12 **REQUEST FOR ACCESS REDUCTIONS SOUGHT IN THIS CASE?**

13 **A.** Yes, I have some concerns. Based upon my experience, a rulemaking certainly is
14 an option, but only an option if the Commission *first* determines the policies it
15 intends to foster going forward. If access reductions are further contemplated by
16 the Commission in this record, then it is CenturyLink's position that a rulemaking
17 proceeding without first undertaking – in an evidentiary context – the interplay
18 between an expanded PA USF, as addressed above, and intrastate switched access
19 rates of CenturyLink and the other RLECs would be akin to putting the cart
20 before the horse. The process also would depart from the Commission's prior
21 actions concerning measured and pro-consumer access reform in high-cost rural
22 areas of Pennsylvania. Moreover, a rulemaking essentially trifurcates the process
23 and, if additional RLEC-based access reductions are deemed proper, limits the

1 Commission's options in light of Section 3017(a), Act 52 of 2008 (regarding
2 VoIP), and the recent developments at the federal level.

3
4 **Q. HAVE YOU REVIEWED THE TESTIMONIES AND PROPOSALS OF**
5 **PARTIES SEEKING ACCESS REDUCTIONS IN THIS PROCEEDING?**

6 **A.** Yes.

7
8 **Q. ARE THESE PROPOSALS CONSISTENT WITH THE MEASURED**
9 **ACCESS REFORM UNDERTAKEN TO DATE FOR THE RLECS?**

10 **A.** No, not at all. First, the mirroring and benchmarking proposals respectively put
11 forth by AT&T, Sprint, Verizon and Comcast would result in significant access
12 revenue reductions to CenturyLink (see Direct Panel Testimony of CenturyLink
13 witnesses Lindsey and Harper) and would significantly impact my company's
14 ability to continue to meet its regulatory obligations in Pennsylvania.
15 Furthermore, these parties suggest that such access revenue reductions can be
16 balanced on the backs of CenturyLink's consumers. They virtually ignore the PA
17 USF. What is being proposed by these parties in no way recognizes that the
18 competitive playing field is already significantly skewed against CenturyLink and
19 the other RLECs given that RLECs have COLR obligations and are the
20 instruments of this Commission's universal service policy providing reliable local
21 exchange service in high cost areas of Pennsylvania.

1 Q. HAS THE COMMISSION REQUIRED THAT CARRIERS RECEIVING
2 ACCESS REDUCTIONS FLOW THROUGH THOSE REDUCTIONS ON A
3 DOLLAR-FOR-DOLLAR BASIS?

4 A. Yes. Based upon my review of the Commission's 2003 Order approving the
5 second phase of access reductions for RLECs in Pennsylvania, the Commission at
6 ordering paragraph 8, provided as follows:

7 That all IXCs shall file annually, by March 31 of each year a report
8 showing how the additional reductions in access charges will reduce the
9 IXCs' average revenue per minute proportionately on a dollar for dollar
10 basis to residential and business customers in Pennsylvania. Failure on
11 the part of IXCs operating in Pennsylvania to file annual reports will result
12 in enforcement action by the Commission.
13

14 Q. HAVE PARTIES SEEKING ACCESS REDUCTIONS IN THIS CASE
15 DEMONSTRATED DIRECT CONSUMER BENEFITS RESULTING
16 FROM THE RELIEF THEY ARE REQUESTING?

17 A. The simple answer to this question is, no. The parties in this proceeding have not
18 demonstrated consumer benefits. Indeed, they have not even proven a correlation
19 between the rate reductions they have obtained and the reductions they seek. Let
20 me examine these points further. First, some of the parties – mainly AT&T and
21 Sprint – point to the fact that competition in the toll market will increase to the
22 benefit of consumers if RLEC access rates are reduced to interstate levels. While
23 appearing positive in theory, the reality is that neither company has pointed to any
24 facts to support how substantial Pennsylvania-specific benefits will be derived
25 from additional access reductions. As Messrs. Lindsey and Harper explain, to
26 determine if intrastate switched access rates should be further reduced in

1 Pennsylvania, a net analysis should be employed and the harms associated with
2 changing the Commission's policies must be weighed against the claimed benefits
3 arising from access reductions as alleged by parties seeking reductions. AT&T
4 points to its "commitment" to reduce its intrastate connection fee should the
5 Commission grant the relief sought by AT&T. Again, while seemingly a benefit
6 in theory, the reality is that the Pennsylvania customer base to which any alleged
7 rate reduction could apply has eroded significantly due to competition and the
8 migration of stand-alone toll service to bundled packages. In fact, the stand-alone
9 toll market had eroded so significantly that in 2005 AT&T effectively abandoned
10 the local and long distance mass market.³ This seeming rate benefit claimed by
11 AT&T is not a benefit – certainly not on net when viewed against the harms to
12 consumers associated with increased local rates, upward pressure on rates, and
13 other adverse ramifications to rural Pennsylvania, as addressed by Messrs.
14 Lindsey and Harper.

15
16 As for Sprint, they make no specific commitments regarding flow-through to
17 consumers, but instead vaguely claim the "competitive market" will somehow
18 ensure flow through of consumer benefits of the access reductions it seeks. What
19 market and where? What consumers given that Sprint is predominantly a wireless
20 provider having shed its ILEC operations. (The CenturyLink Panel Direct
21 testimony also addresses Sprint's SEC filings.) Indeed, out of the approximately

³ *In the Matter of SBC Communications Inc., and AT&T Corporation Application for Approval of Transfer of Control*, FCC WC Docket No. 05-65 (Application filed February 21, 2005), Declaration of John Polumbo. President and CEO, AT&T Consumers Services.

1 6.9 million telephone consumers in Pennsylvania, Sprint only serves 64,091
2 customer in the Commonwealth. Thus, Sprint's alleged consumer benefits will be
3 reaching less than 1% of all telephone customers in Pennsylvania. Sprint is silent
4 about specifics. The alleged benefits of access reductions laimed by Sprint cannot
5 support a Commission finding that any additional access rate reductions will
6 provide direct, tangible, and durable net benefits in Pennsylvania.

7
8 **Q. YOU MENTIONED A FIRST POINT. IS THERE A SECOND POINT?**

9 **A.** Yes, there is. These parties have not even demonstrated that the RLEC access
10 reductions already implemented in Pennsylvania have been flowed-through to
11 consumers. The Commission and the public cannot have any confidence that the
12 access reductions these parties seek will provide consumer benefits Pennsylvania.

13
14 Specifically, in discovery, Sprint was asked to provide any filings made by Sprint
15 to the Commission demonstrating that Sprint flowed through access reductions
16 previously ordered by the Commission.⁴ Similarly, to date, AT&T has not been
17 able to identify any specific reductions that flowed-through to Pennsylvania
18 consumers as a result of the access reductions ordered by the Commission in 1999
19 and 2003.⁵ These parties have failed to produce any documents – not in

⁴ CTL-Sprint 2-18 is subject to a motion to compel filed by CenturyLink. CenturyLink reserves the right to update this testimony based upon the ruling on the motion to compel.

⁵ Responses to CTL-ATT 2-31 and 2-30 are attached at Exhibit DFB-1. CenturyLink filed a motion to compel against AT&T, but did not include CTL-ATT 2-31 as AT&T had represented it would provide a response. At the time of filing of my direct testimony, counsel for AT&T indicated that it would formally supplement its discovery. CenturyLink reserves the right to update this portion of its testimony and to seek any other relief.

1 compliance with Ordering Paragraph 8 of the Commission's 2003 Order and not
2 in their direct testimonies where they now seek additional reductions in RLEC
3 access rates. Their theories and unsupported claims of an alleged correlation
4 between reductions in intrastate switched access rates and alleged rate and non-
5 rate benefits should be dismissed.

6
7 **Q. WHAT ABOUT VERIZON (FORMER MCI) CONCERNING DOLLAR-**
8 **FOR-DOLLAR FLOW OF REDUCTIONS PREVIOUSLY**
9 **IMPLEMENTED BY THE COMMISSION?**

10 **A.** In discovery, Verizon provided a letter dated April 12, 2004 sent by MCI to
11 Secretary McNulty, attached hereto at Exhibit DFB-2. In the letter, MCI (now
12 Verizon) erroneously claims why it cannot comply with the Commission's order.
13 Yet, it was MCI that received the access savings and MCI – both then and now –
14 that asserts the reductions somehow caused benefits to inure to consumers.

15
16 **Q. ASIDE FROM CENTURYLINK'S RETAIL CUSTOMERS, ARE THERE**
17 **OTHER BENEFICIARIES TO ROBUST LOCAL SWITCHED**
18 **TELEPHONE NETWORK?**

19 **A.** Virtually all consumers benefit from access to a robust telecommunications
20 network. Regardless of whether users stay connected through landlines, cell
21 phones or calls completed over the Internet, virtually all calls travel through the
22 traditional network at some point. Building and maintaining the local network,

1 especially in rural, high-cost areas, is capital intensive. The IXCs don't do it;
2 local providers, like CenturyLink, do.
3

4 **Q. DO THE PARTIES TO THIS PROCEEDING SEEKING ACCESS**
5 **REDUCTIONS BENEFIT FROM CENTURYLINK'S LOCAL**
6 **NETWORK?**

7 **A.** Absolutely, both the IXC and wireless arms of AT&T, Sprint and Verizon benefit
8 from a reliable local telephone network. The toll services offered by the IXCs, for
9 the most part, ride over the local networks of companies like Centurylink. And,
10 wireless communications depend on the wireline network. As well, Comcast
11 benefits from the local switched network when its customers originate or
12 terminate calls from a traditional landline telephone service. Although
13 telecommunications providers would often prefer to avoid paying other carriers
14 for network access – as demonstrated by the parties to this case – such payments
15 are vital for maintaining the underlying switched telephone network.
16

17 **III. STATUTORY FRAMEWORK**

18 **Q. ARE YOU FAMILIAR WITH PA 66 C.S.A. SECTION 3017?**

19
20 **A.** Yes. Section 3017(a) of Act 183 of 2004 states: "The Commission may not
21 require a local exchange telecommunications company to reduce access rates
22 except on a revenue neutral basis."

1 **Q. WHAT IS YOUR INTERPRETATION OF THE REVENUE NEUTRALITY**
2 **PROVISION IN SECTION 3017(a) OF ACT 183 OF 2004?**

3 **A.** Section 3017 (a) of Act 183 of 2004 states that the Commission may not require
4 reductions in intrastate access charges except on a revenue neutral basis. To me,
5 this means that the Commission cannot reduce the intrastate access rate for
6 CenturyLink and the other RLECs without ensuring availability of other revenue
7 sources to offset the resultant revenue reductions. Historically, such revenue
8 reductions were offset by increases to local rates and by funds from the PA USF.
9 However, as the testimony of the other CenturyLink witnesses demonstrate,
10 CenturyLink's local rates can no longer absorb even a small portion of such
11 revenue reductions. The only viable revenue source available to ensure revenue
12 neutrality for CenturyLink as required by Section 3017(a) is the PA USF.

13
14 **Q. ARE THE RECOVERY SCHEMES SET FORTH IN THE TESTIMONIES**
15 **OF AT&T, SPRINT, COMCAST AND VERIZON VIABLE AND PROPER**
16 **OPTIONS GIVEN YOUR READING OF SECTION 3017(a)?**

17 **A.** No. Quite simply, the positions taken in this case by AT&T, Sprint, Comcast and
18 Verizon place the Commission in an untenable position. These parties are asking
19 the Commission to reduce RLEC intrastate access rates to their interstate rates or
20 to adopt Verizon's intrastate access rates as a "benchmark" with little or no
21 acknowledgement of the significant difficulty the Commission will have in
22 finding revenue streams to ensure compliance with the revenue neutrality
23 provision in Section 3017 of the Pennsylvania Public Utility Code.

1 AT&T, Sprint, Comcast and Verizon point to the services provided by the RLECs
2 (including bundled services) as an option for recovery of lost revenues due to
3 access reductions. Of course, the position they take is convenient. But, the
4 position also supports *their* business interests as their proposals foist rate
5 increases on bundles that the affiliates – often the unregulated affiliates – of these
6 parties are also offering. Moreover, the proposal does not take into account the
7 significant amount of competition that exists in CenturyLink’s service territory,
8 nor does it take into account that CenturyLink’s current \$18.00 per month local
9 residential rate in Pennsylvania is already above the national average. And, while
10 AT&T points to an access rebalance rate of \$5.35 as being “affordable”, our
11 customers have very clearly told us that even nominal increases in their monthly
12 bills (not just local rates) will force them to choose another carrier, as addressed
13 in the Direct Testimony of Dr. Brian Staihr.

14
15 **Q. IF REVENUE NEUTRALITY CANNOT BE ACHIEVED THROUGH**
16 **INCREASING LOCAL RATES, THEN WHAT OPTIONS ARE LEFT FOR**
17 **THE COMMISSION TO MEET THE STATUTORY REQUIREMENT?**

18 **A.** Should the Commission ultimately decide that reductions to intrastate switched
19 access rates are just and reasonable, then the Commission also needs to ensure
20 that the PaUSF continues as a viable mechanism to offset any such reductions.
21 Moreover, as addressed above, the Commission’s December 10, 2009 Order
22 limited the scope of this proceeding. If the Commission determines it is just and
23 reasonable to undertake additional access reductions as a result of this proceeding,

1 then before it implements any such reductions it should investigate and allow for
2 development of an evidentiary record to determine how best to continue and
3 expand the PA USF, as addressed above. In doing so, the Commission is best
4 positioned to comply with its statutory obligations and to ensure that consumers
5 continue to derive the benefits of a fair and equitable regulatory framework.

6
7 **Q. ARE YOU FAMILIAR WITH SECTION 1309(b) OF THE**
8 **PENNSYLVANIA PUBLIC UTILITY CODE?**

9 **A.** Yes, generally from a lay person's perspective.

10
11 **Q. DOES CENTURYLINK MEET THE STATUTORY THRESHOLDS FOR**
12 **RETROACTIVE RATE RELIEF CONTAINED IN SECTION 1309(b)?**

13 **A.** No, CenturyLink does not meet the thresholds necessary to trigger the provisions
14 of Section 1309(b).⁶ CenturyLink has a total of 292,914 customers who pay
15 access charges in Pennsylvania (local voice customers and IXCs) and only 47
16 IXCs and other access users would benefit from any reductions sought in this
17 proceeding. This results in a percentage of .016 customers who will benefit from

⁶ Section 1309(b) provides a pertinent part as follows:

This subsection shall apply only when the requested reduction in rates affects more than 5% of the customers and amounts to in excess of 3% of the total gross annual intrastate operating revenues of the public utility, provided that, if the public utility furnishes two or more type of service, the foregoing percentages shall be determined only on the basis of customers receiving, and the revenues derived from, the type of service to which the requested reduction pertains.

1 intrastate access reductions, which is significantly less than the 3% threshold
2 identified in the statute.

3
4 **Q. CAN YOU EXPLAIN WHY THE 3 PERCENT TOTAL OPERATING**
5 **REVENUE REDUCTION DOESN'T APPLY TO THIS PROCEEDING?**

6 **A.** Yes. The "3% total operating revenue reduction" threshold contained in Section
7 1309(b) realistically can never be met relative to access charge reductions. This is
8 due to the revenue neutrality requirement contained in Section 1307(a) of the
9 Pennsylvania Public Utility Code, as addressed above. In effect, this makes the
10 3% threshold irrelevant because the revenue neutrality requirement will always
11 result in an operating reduction of \$0.

12
13 **Q. SHOULD THE COMMISSION BE ADDRESSING RETROACTIVITY IN**
14 **THIS PROCEEDING AS IT RELATES TO CENTURYLINK?**

15 **A.** No. The Commission should outright reject the attempts by any party to claim
16 that retroactive rate relief is appropriate or required. It is not. Furthermore, doing
17 so is fraught with administrative and policy questions.

18
19 **IV. CONCLUSION**

20 **Q. WHAT ARE YOU ASKING THE COMMISSION TO DO IN THIS**
21 **PROCEEDING?**

22 **A.** CenturyLink is requesting that the Commission reject the claims of AT&T,
23 Sprint, Verizon and Comcast that our current intrastate switched access rates are

1 `unjust and unreasonable. The Commission should reject the specific relief
2 requested by the parties seeking access reductions *i.e.*, mirroring and
3 benchmarking. If the Commission determines to further reduce intrastate
4 switched access rates of CenturyLink, then it should do so consistent with
5 CenturyLink's recommendations.

6

7 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

8 **A. Yes.**

Michelle Painter, Senior Attorney
Law and Public Policy
1133 19th Street, NW
Washington, DC 20036
Telephone 202 735 6204



April 12, 2004

Via Overnight Delivery

James J. McNulty, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

REC'D APR 13 2004

Re: Access Charge Investigation Per Global Order of September 30, 1999, Docket Nos. P-00991648, P-00991649 and M-00021596

Dear Mr. McNulty:

I am writing on behalf of MCI WorldCom Network Services, Inc. ("MCI") with respect to the Commission's July 15, 2003 Order in the above-referenced case. As part of that Order, the Commission directed IXCs to submit a report "showing how the additional reductions in access charges will reduce the LXC's average revenue per minute proportionately on a dollar for dollar basis to residential and business customers in Pennsylvania."

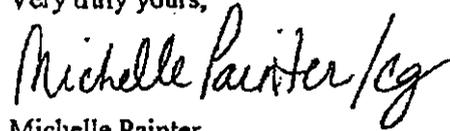
MCI agrees with AT&T's letter of April 7, 2004 regarding this Commission directive. First, because of the fact that most of the rural ILECs bill MCI via paper bills, it would be extremely difficult to historically determine when rate changes may have occurred and the amount of those changes. Therefore, it is critical that the Commission grant AT&T's recommendation to direct the incumbent LECs who are parties to the Joint Proposal to submit a report detailing the status of their compliance with the terms of the Joint Proposal that was approved by this Commission, thereby delineating the exact amount of the access charge reductions that were implemented on an aggregate and company-wide basis.

Second, MCI agrees with AT&T's statements regarding the questionable legal basis for the Commission's directive towards IXCs to demonstrate such flow through.

Regardless, at this time, MCI is unable to accurately provide information related to the Joint Proposal reductions unless and until the ILECs provide some type of report regarding the amount of reductions that have been implemented.

Please contact me if you have any questions or concerns with this matter.

Very truly yours,

A handwritten signature in black ink that reads "Michelle Painter /cg". The signature is written in a cursive style with a large, looped "M" and a stylized "P".

Michelle Painter

cc: Elizabeth Barnes, PA PUC
Janet Tuzinski, PA PUC
Service List

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Investigation Regarding Intrastate :
Access Charges and IntraLATA Toll :
Rates of Rural Carriers and :
The Pennsylvania Universal :
Service Fund :

Docket No. I-00040105

RECEIVED

APR 20 2010

AT&T Communications of :
Pennsylvania, LLC :
Complainant :

**PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU**

v. :

Docket Nos. C-2009-2098380, *et al.*

Armstrong Telephone Company - :
Pennsylvania, et al. :
Respondents :

SURREBUTTAL TESTIMONY OF

DAVID F. BONSICK

**ON BEHALF OF
THE UNITED TELEPHONE COMPANY OF PENNSYLVANIA LLC D/B/A
CENTURYLINK**

STATEMENT 3.1

4/15/10 Hbg jr

**** PUBLIC VERSION****

Pre-Filed April 1, 2010

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1 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 **A.** My name is David F. Bonsick and my business address is 240 N. Third Street,
3 Suite 201, Harrisburg, PA 17101.

4

5 **Q. ARE YOU THE DAVID F. BONSIK THAT SUBMITTED DIRECT**
6 **TESTIMONY IN THIS PROCEEDING DATED JANUARY 20, 2010?**

7 **A.** Yes.

8

9 **Q. WHAT IS THE PURPOSE OF YOUR SURREBUTTAL TESTIMONY?**

10 **A.** The purpose of my Surrebuttal Testimony is to address statements made by
11 witnesses for other parties in their Rebuttal Testimony in this proceeding. I
12 specifically will address statements made in the March 10, 2010 Rebuttal
13 Testimonies of Mr. James A. Appleby on behalf of Sprint, Dr. Michael Pelcovits
14 on behalf of Comcast, Mr. E. Christopher Nurse and Dr. Ola A. Oyefusi on behalf
15 of AT&T and Mr. Don Price on behalf of Verizon.

16

17 **Q. PLEASE SUMMARIZE YOUR SURREBUTTAL TESTIMONY.**

18 **A.** Several parties – AT&T, Sprint, Comcast, Qwest and Verizon – go to great
19 lengths in their Rebuttal Testimonies trying to demonstrate the consumer benefits
20 that will be derived from the access reductions they seek. They use terms like
21 “balanced competitive market,” “level playing field” and “allowing competition
22 to work” to describe their unsupported views that lower intrastate access rates will
23 have a greater net benefit to consumers than the current intrastate access structure.

1 These claims are not only erroneous and over-hyped, but their views are
2 recklessly myopic as they fail to recognize that the current levels of intrastate
3 switched access rates charged by CenturyLink continue to serve the vital social
4 and important regulatory purpose (along with state USF support) to ensure the
5 continued availability of reliable and affordable basic local telephone service to
6 all consumers in Pennsylvania regardless of where they may live. Based upon my
7 review of the testimonies, these parties simply seek intrastate switched access
8 reductions rather than viable, consumer-focused access reform. Their reductions
9 have nothing to do with enhancing competition in rural Pennsylvania or reducing
10 consumers' rates. Actually, their "reform" proposals would dramatically increase
11 local exchange rates for rural Pennsylvanians. These carriers are not committed to
12 rural Pennsylvania and their proposals are far from "reform."

13
14 Under the guise of continued access reform, these carriers merely make bald
15 assertions that benefits will inure to consumers, but the reality is that they have
16 not shown how prior reductions have benefitted rural Pennsylvania. The benefits
17 they tout are theories from a bygone era. Their chosen litigation strategy relies
18 upon outdated and flawed assumptions that are no longer applicable to today's
19 telecommunications market. Fortunately, as my Direct Testimony addressed, this
20 Commission has historically fashioned holistic telecommunications policy to
21 ensure a benefit for rural consumers and that intrastate switched access rate
22 reductions are not done simply for the sake of providing AT&T and others with
23 cost reductions to benefit their bottom lines. These parties absolutely fail to

1 recognize that the very entities they claim have a competitive advantage vis-à-vis
2 current intrastate access rates – CenturyLink and the other RLECs – are the
3 entities that are still very much regulated by the Pennsylvania Public Utility
4 Commission in terms of quality of service, reporting requirements and rates for
5 protected services. It is very ironic that these carriers, whom are mostly void of
6 any state regulatory obligations, are the entities clamoring for a “level” playing
7 field and regulatory parity. RLECs continue to shoulder the lions share of
8 regulatory burdens in the Pennsylvania telecommunications market and the
9 proposals advanced by AT&T, Sprint, Comcast and others only make these
10 regulatory burdens more difficult to sustain going forward. Even if one assumes
11 there are some limited benefits that may flow to Pennsylvania consumers from
12 such access reductions, the reality is that, on net, consumers in Pennsylvania –
13 especially rural Pennsylvania – will be harmed by the such reductions.

14
15 These parties take a much distorted and erred view of today’s telecommunications
16 marketplace by asserting that CenturyLink is able to simply raise its local rates or
17 increase the prices for our bundled services to recover lost revenues that would
18 result from the access reductions they support. The simple fact is these very same
19 companies are directly competing against CenturyLink for not only the
20 provisioning of voice service, but high-speed Internet and entertainment services
21 as well. Thus, they have a biased, vested interest in CenturyLink and the other
22 Pennsylvania RLECs raising local rates for services (even competitive services or
23 unregulated services) as it would simply better their competitive position and

1 make them an even more robust alternative for many CenturyLink customers.
2 Additionally, the Commission needs to understand that CLECs compete for total
3 customer revenue, including revenue derived from access charges, thereby
4 making their proposals a “win-win” for them alone.
5

6 **I. ACCESS REFORM IN PENNSYLVANIA**

7 **Q. DO YOU AGREE WITH SPRINT WITNESS APPLEBY THAT IT IS**
8 **NECESSARY FOR THE PENNSYLVANIA PUBLIC UTILITY**
9 **COMMISSION TO UNDERTAKE ADDITIONAL ACCESS REDUCTIONS**
10 **AS SPRINT AS ADVOCATED IN THIS PROCEEDING?**

11 **A.** No, I do not agree with Mr. Appleby. As I stated in my Direct Testimony, this
12 Commission has undertaken considerable reform and implemented sizeable *ACCESS*
13 *reductions* relative to the RLECs, including CenturyLink. Moreover, the Commission’s
14 rational, measured approach to RLEC access reform over the past decade
15 balanced the interests of IXCs, CLECs and the RLECs, including CenturyLink.
16 However, the greatest beneficiary of the Commission’s deliberate approach to
17 access reform has been Pennsylvania’s consumers, especially those in high-cost,
18 rural areas of the Commonwealth that continue to have available to them
19 affordable and reliable local telephone service. The access structure at both the
20 federal level and the state level has been cobbled together over time to serve the
21 purpose of ensuring basic local telephone service at reasonable prices for all
22 consumers, regardless of where they live. If the basic public policy tenets of
23 universal service/COLR are going to be preserved, then this Commission must

1 continue to take a deliberate approach to access reform that places rural
2 Pennsylvanians at the forefront of any regulatory action.

3
4 **Q. DOES CENTURYLINK SUPPORT REFORM OF THE CURRENT**
5 **ACCESS STRUCTURE?**

6 **A.** CenturyLink has publicly stated previously that we could support a balanced,
7 well-transitioned approach to access reform that includes changes to the entire
8 construct of intercarrier compensation at both the federal and state levels. Such
9 reform would have to recognize the tremendous growth of intermodal competition
10 in the telecommunications industry and that the historic remedy of simply
11 increasing rates for rural Pennsylvanians (*i.e.*, the “end users” under the theory of
12 “cost causation”) is no longer a viable or feasible. This type of outmoded
13 response is no longer sustainable as it directly and adversely harms rural
14 Pennsylvanians without any net benefits demonstrated by the proponents of
15 access reductions. The result is less ability to invest in infrastructure, increased
16 local rates, and less incentive to invest in new and innovative products and
17 services. And, it must be pointed out, that the costs for RLECs do not magically
18 “go away” when CenturyLink loses a customer to competition. *: in fact, per unit costs increase.* Thus, the
19 regulatory burden and its associated costs continue despite access line losses.
20 Without the continuance of a robust and viable state USF, rate increases to fund
21 the magnitude of access reductions sought by the parties runs contrary to Act 183
22 revenue-neutral requirement and are ill-advised given that CenturyLink has fewer
23 and fewer customers over which to spread costs. None of the proposals simply to

1 slash access rates with rhetoric of “opportunities” to recover the ramifications of
2 their proposals accomplishes comprehensive and rational reform in this manner.
3 And, as addressed by Messrs. Harper and Lindsey, measured reform in
4 Pennsylvania must take into account recent activity by the FCC relative to the
5 National Broadband Plan and Federal Universal Service Fund reform.

6
7 In addition to rational access reform as proposed by CenturyLink, CenturyLink
8 would support regulatory changes that truly ensure that the “level” playing field
9 results in parity for RLECs operating in Pennsylvania. However, making the
10 playing field level are aspects of holistic reform but are beyond the scope of this
11 proceeding. Before the Commission reduce access rates to “level” the playing
12 field as alleged by AT&T, Sprint and the others, the Commission should ensure
13 that RLECs are truly at parity with these and other players in the market. The
14 interests of Pennsylvania’s consumers, especially rural consumers, and the
15 continuance of robust infrastructure investment in rural Pennsylvania is what is at
16 stake in this proceeding.

1 **II. CENTURYLINK'S RESPONSE TO AT&T'S REVISED POSITION IN**
2 **REBUTTAL TESTIMONY**
3

4 **Q. DOES AT&T IN ITS REBUTTAL TESTIMONY OFFER A SO-CALLED**
5 **DIFFERENT "SOLUTION" FOR INTERCARRIER COMPENSATION**
6 **THAN THAT OF ITS ORIGINAL TESTIMONY?**

7 **A.** Yes it does. AT&T's Rebuttal Testimony (pgs 3-5) states that the proposal by the
8 OCA – with certain modifications – will resolve the issues in this case.
9

10 **Q. IS AT&T'S MODIFIED PROPOSAL REASONABLE?**

11 **A.** No. CenturyLink very much agrees with the position of the OCA that a
12 reasonable benchmark rate must be established if this Commission is going to
13 mirror intrastate and interstate switched access rates. However, AT&T's position
14 puts forth a benchmark rate that is not only untenable given the increasingly
15 competitive telecommunications marketplace, but also very self-serving in that it
16 will benefit them as a competitor to CenturyLink and other RLECs in
17 Pennsylvania.
18

19 **Q. CAN YOU PLEASE EXPLAIN?**

20 **A.** Yes. CenturyLink agrees with OCA's position relative to both its reasonable
21 benchmark rate (of \$17.09/per month for residential service) and the fact that
22 revenue recovery for reduced intrastate access rates must come mostly from an
23 expanded state USF. AT&T, however, hijacks the OCA's position and then
24 advocates for an ultimate benchmark rate (\$25) that is well-above reasonability

1 for CenturyLink in today's hyper-competitive telecommunications marketplace.
2 CenturyLink suggests that OCA's proposed benchmark rate of \$17.09/month
3 (residential) is more reasonable than AT&T's modified rebuttal. Indeed, OCA's
4 \$17.09/month rate is more in line with the record as adduced in this proceeding,
5 especially the consumer survey addressed in CenturyLink's Direct Testimony.
6 Actually, AT&T's initial proposed benchmark rate of \$21.97 as set forth in
7 AT&T's Direct Testimony (p.59. line 1), demonstrates the unreasonableness of
8 AT&T's \$25.00 benchmark. Furthermore, CenturyLink believes that all revenue
9 recovery for rates set above any new benchmark rate must come from an
10 expanded Pennsylvania USF. In order for any reasonable resolution to this case
11 to occur, the Commission or the parties to a settlement must recombine the
12 concepts of intrastate access and the PA USF, as the two are inextricably linked.
13 Finally, as part of any reform of access rates, CenturyLink would support
14 regulatory changes that truly ensure that the "level" playing field results in parity
15 for RLECs operating in Pennsylvania. Contrary to the claims of AT&T, Sprint,
16 Comcast and others, the regulatory playing field in the telecommunications
17 industry in Pennsylvania is not level for the RLECs. As part of the outcome of
18 this proceeding, additional steps to achieve real regulatory parity between
19 incumbent carriers and their intermodal competitors should be taken.

1 Q. DOES CENTURYLINK SUPPORT A PARTICULAR BENCHMARK
2 ABOVE CENTURYLINK'S CURRENT \$18 LOCAL R1 RATE?

3 A. CenturyLink's customer survey demonstrates the risk associated with increasing
4 the current residential local benchmark rate of \$18.00. Any increase to the
5 current rate must be reasonable and well-measured. What is known is that neither
6 AT&T's \$22.00 benchmark rate nor its \$25.00 benchmark rate is reasonable or
7 viable. It is easy for AT&T to throw such numbers in the air when it bears no risk
8 for that benchmark being incorrect. The Commission, at a minimum, should look
9 to an assumption of risks analysis when setting benchmarks. CenturyLink
10 believes that such an analysis would demonstrate that, even at AT&T's initial
11 proposed benchmark rate of \$22.00, the risk is directly borne by CenturyLink and
12 its mostly rural customer base. It is critical therefore that any Commission
13 decision in this proceeding or in any settlement effort arising from this proceeding
14 other matter must be especially vigilant of any increases beyond the current
15 \$18.00/month residential benchmark (and the associated business benchmark
16 rate). Benchmarks must be reasonable and undertaken as part of this
17 Commission's continued holistic reform policy and thereby must recognize the
18 necessity of a viable, expanded state USF for the purposes of revenue recovery
19 and in compliance with 66 PA.C.S. §3017(a).

1 Q. OVER WHAT TIMEFRAME SHOULD INTRASTATE ACCESS
2 REFORM OCCUR?

3 A. A “transition” period over which any continued access reform should be
4 implemented in Pennsylvania. CenturyLink supports a gradual phase-in of access
5 reform over reasonable transition period so as to protect ratepayers in the most
6 rural portions of our service territory and shield all consumers from burdensome
7 rate increases in these very difficult economic times. We explicitly disagree with
8 the four-year phase-in proposed by AT&T; as such a short transition period will
9 not mollify the impacts on Pennsylvania’s rural consumers associated with such
10 access reductions. In addition, given the activity at the FCC, access reductions –
11 particularly when competition is thriving and the necessity for reductions has not
12 been proven – can be timed to coordinate with federal efforts to ensure that rural
13 Pennsylvanians are not left behind.

14

15 III. COMPETITION IN CENTURYLINK’S PENNSYLVANIA SERVICE
16 TERRITORY
17

18 Q. DO YOU AGREE WITH THE WITNESSES/PARTIES SEEKING ACCESS
19 REDUCTIONS THAT CENTURYLINK IS SIMPLY TRYING TO GAIN A
20 COMPETITIVE ADVANTAGE BY MAINTAINING INTRASTATE
21 SWITCHED ACCESS RATES AT CURRENT LEVELS?

22 A. I certainly do not agree with these views. The fact of the matter is that since
23 2005, CenturyLink has lost [BEGIN CTL CONFIDENTIAL] ██████████
24 ██████████ [END CTL CONFIDENTIAL] of its access lines in Pennsylvania to
25 competitors like Sprint, Comcast and others. And, even today, CenturyLink’s

1 access line erosion continues at a significant pace (approximately 7%-8% per
2 year). It is obviously absurd and self-serving for CenturyLink's competitors,
3 including Sprint, to claim they are disadvantaged in the marketplace when they
4 clearly are making successful gains in market share. I fail to see what competitive
5 disadvantage exists for these carriers or how the current access structure has
6 inhibited their ability to compete for CenturyLink's customers. RLECs' intrastate
7 switched access rates have not been and will not be in the future a detriment to
8 competition and there really is no longer any nexus between reducing intrastate
9 switched access rates and competition.

10
11 **Q. WHAT TYPE OF COMPETITION IS CENTURYLINK EXPERIENCING**
12 **IN ITS LOCAL MARKET?**

13 **A.** CenturyLink continues to see robust inter-modal competition for residential
14 consumers, including wireless voice and data services, cable voice and data
15 services, and VoIP services (e.g. Vonage, Magic Jack). And, on the business
16 customer side, IP and data service providers are targeting all classes of business
17 customers.

18
19 **Q. HOW DOES CENTURYLINK KNOW WHAT CARRIERS ARE**
20 **COMPETING FOR CUSTOMERS IN ITS SERVICE TERRITORY?**

21 **A.** First, we generally know what competition exists because our customers tell us.
22 They tell us when they call to cancel their services with us and when they call to
23 have their number ported to another carrier. Second, competitors continue to

1 aggressively advertise service availability in CenturyLink's local service territory.
2 And, finally, we can track to what carrier a CenturyLink number is being ported.
3 In this manner we can identify that between October 1, 2009 and February 28,
4 2010 [BEGIN CTL CONFIDENTIAL] [REDACTED]
5 [REDACTED] [END CTL CONFIDENTIAL] had
6 ported their CenturyLink telephone number over to Comcast. Obviously, if over a
7 5 month period Comcast was able to lure away nearly [BEGIN CTL
8 CONFIDENTIAL] [REDACTED] [END CTL CONFIDENTIAL] of CenturyLink's
9 customer base, the current access charge rates are not inhibiting factor in their
10 ability to compete.

11
12 **Q. ACCORDING TO COMCAST'S RESPONSES TO CENTURYLINK**
13 **DISCOVERY QUESTIONS, COMCAST CLAIMS IT DOES NOT**
14 **COMPETE AGAINST CENTURYLINK FOR VOICE SERVICE IN**
15 **PENNSYLVANIA. CAN YOU PLEASE EXPLAIN?**

16 **A.** Yes. Throughout this case, Comcast has played a corporate shell game, hiding
17 behind the fact that the entity or entities that provide voice and data services in
18 CenturyLink's service territory are not the entities participating in this case.
19 Through the discovery process, CenturyLink (and the Office of Consumer
20 Advocate) attempted to identify not only the number of voice customers served by
21 Comcast, but where Comcast has the facilities to provide voice service to
22 customers. Comcast's simple answer has been that neither Comcast entity
23 involved in this proceeding is a competitor to CenturyLink. See, Exhibit DFB-3

1 (responses to CTL-Comcast III-5 thru III-11). Regardless of Comcast's answers
2 to these discovery questions, the simple fact of the matter is that Comcast markets
3 these services in CenturyLink's territory, customers call Comcast or go to
4 Comcast.com to order service, a Comcast-authorized technician installs the
5 service and the customer is billed by Comcast and pays Comcast for the service.
6 Thus, regardless of what corporate entity they want to hide behind in this
7 proceeding, it is abundantly clear that Comcast is a very aggressive and successful
8 competitor to CenturyLink in our Pennsylvania service territories. And, clearly
9 the playing field is "level" such that access reductions have nothing to do with
10 enhancing competition as purported by AT&T, Sprint, Comcast and others.

11
12 **Q. DOES COMCAST BELIEVE IT HAS COLR/UNIVERSAL SERVICE**
13 **RESPONSIBILITIES?**

14 **A.** No. As Messrs. Lindsey and Harper note in their Panel Surrebuttal Testimony
15 (*See*, Comcast response at CTL-Comcast 1-23)).

16
17 **Q. DO YOU HAVE ANY CONCERNS IN LIGHT OF THESE**
18 **STATEMENTS?**

19 **A.** Yes. These statements simply underscore the need for the Commission to take a
20 measured, comprehensive approach to access reform as I addressed above. The
21 telecommunications market in Pennsylvania has evolved such that the typical
22 response of rebalancing through local rate increases – to allegedly remove
23 subsidies and level the competitive playing field – are no longer reasonable

1 justifications for regulatory action. Comprehensive and rational access reform
2 should include parity among all players. As the Comcast responses to discovery
3 demonstrate, until all these issues are examined and addressed by the
4 Commission, access reductions based upon assumptions of enhancing competition
5 and the unlevel playing field in Pennsylvania will bring few, if any, benefits to
6 consumers.

7
8 **IV. FLAWED CLAIMS THAT ACCESS REFORM WILL BENEFIT RURAL**
9 **PENNSYLVANIANS**
10

11 **Q. AT&T WITNESSES NURSE AND OLYFUSI CLAIM THAT**
12 **CENTURYLINK AND OTHER PA RLECS HAVE NO GREATER**
13 **UNIVERSAL SERVICE AND COLR OBLIGATIONS THAN OTHER**
14 **CARRIERS (I.E. CLECS, WIRELESS AND VOIP CARRIERS). IS THIS**
15 **TRUE?**

16 **A.** No, this is not true. Incumbent carriers like CenturyLink serving high-cost, less
17 dense areas of the Commonwealth have long been this Commission's instruments
18 of faithfully carrying out the public policy goals of COLR/universal service in
19 rural Pennsylvania. No cost demonstration is needed to tell this Commission that
20 when enacting Act 183 of 2004, the Pennsylvania General Assembly intended to
21 ensure that all Pennsylvanians had access to universally available and affordable
22 telephone service.¹ Access rates are a critical component to ensuring that the
23 Commission's COLR and universal service policies are maintained in rural

¹ Act 183 of 2004, Sections 3011 (2) and (3).

1 Pennsylvania. Within our franchised service territory, CenturyLink must provide
2 service to any and all consumers who request us to do so. It is absolutely
3 disingenuous and contrary to these fundamental public policy tenets for AT&T to
4 infer that CenturyLink's universal service and COLR obligations are no more
5 stringent than those of CLECs, IXC's or other competitive carriers.

6
7 **Q. AT&T CLAIMS THAT ITS NEW-FOUND PROPOSAL DOESN'T DENY**
8 **CENTURYLINK ANY REVENUES. CAN YOU COMMENT?**

9 **A.** Yes. AT&T's proposal places the majority of the burden for revenue recovery
10 squarely on the shoulders' of CenturyLink's customers and is premised on the fact
11 that CenturyLink can increase its benchmark rate to \$25 (this is before addition of
12 the Subscriber Line Charge, 911 fees, universal service fees and taxes). Through
13 its customer survey submitted in Direct Testimony, CenturyLink has already
14 demonstrated that in today's hyper-competitive telecommunications marketplace,
15 our customers are unwilling to pay increasingly higher rates for their
16 telecommunications needs. Thus, under the AT&T proposal, CenturyLink would
17 run a significant risk of losing even more customers to competitors (and at a faster
18 pace) as prices for basic local service and bundled services would be increased to
19 a level unacceptable to many of our customers. This increase in local rates will
20 not only benefit AT&T, but also other competitors in our local market, including
21 Comcast and Sprint. Conversely, AT&T proposes to share very little of the
22 burden for revenue replacement associated with access reductions, even though

1 they would derive significant financial benefits from the access reform that they
2 propose.

3
4 AT&T has provided no elasticity studies or any other analyses to demonstrate that
5 its proposal is viable and sustainable in today's competitive intermodal market.
6 And, AT&T has provided no studies or any analyses to show how its proposal
7 would pass muster under 66 PA.C.S § 3017(a). (See, Exhibit DFB-4, responses to
8 CTL-ATT IV-2 thru IV-10.) The best that can be said of AT&T's new-found
9 position is that, at least on paper, the math may work out and the revenues
10 assumed by AT&T are recovered by CenturyLink. But, that assumption does not
11 take into account the realities of today's competitive telecommunications
12 marketplace. AT&T has failed to demonstrate that either its original position or
13 is modified position in its Rebuttal Testimony is viable or compliant with
14 statutory requirements so that this Commission can find the access reductions
15 sought by AT&T to be just and reasonable.

16
17 **Q. CAN YOU COMMENT ON SPRINT'S STATEMENTS THAT IT IS**
18 **COMMITTED TO RURAL PENNSYLVANIA?**

19 **A.** Yes. Despite their claims regarding capital investment and customer counts in
20 RLEC exchanges, Sprint's statements fall well short in terms of credibility. First,
21 as discussed earlier relative to AT&T's Rebuttal Testimony, it has been long-
22 standing public policy that the incumbent carriers, including CenturyLink, be the
23 instruments for carrying-out universal service and COLR obligations. These

1 basic public policy tenets are the true measurement of commitment to rural
2 Pennsylvania, not some recitation of facts and figures simply designed to fool the
3 eye. Second, let's actually take Sprint's figures and flesh them out relative to
4 Pennsylvania's demographics. Consider that there are sixty-seven (67) counties
5 in Pennsylvania and that (according to the 2006 census) 66.4 percent of
6 Pennsylvanians live in fifteen (15) of the 67 counties. This would mean that
7 Sprint is providing service to only a portion of the remaining predominantly rural
8 counties. Actually, to meet Sprint's claim to cover [BEGIN CONFIDENTIAL]
9 [REDACTED] [END CONFIDENTIAL] of Pennsylvanians, they would have to provide
10 service in fifty-seven (57) counties using the same census information. This
11 leaves ten (10) counties (rural) or 14.9% completely unserved by Sprint. ~~And,~~
12 ~~Sprint achieves much of this service level through roaming agreements, which~~
13 ~~requires no capital outlay from Sprint itself.~~ And, Sprint achieves much of this
14 service level through roaming agreements, which requires no capital outlay from
15 Sprint itself (*see*, Exhibit DFB-5, response to CTL Sprint V-4).

16
17 To further determine the validity of Mr. Appleby's claims, CenturyLink
18 researched the of Sprint's wireless service availability in several of our exchanges
19 in Pennsylvania. According to Sprint resources (customer care and Sprint
20 website), service was not offered whatsoever in two of the six exchanges in which
21 we requested service. In the remaining four exchanges, Sprint service was
22 provided solely through roaming agreements (*see*, Exhibit DFB-6, Sprint
23 Coverage Tool). Interesting enough, Sprint appears to be discouraging customers

1 basic public policy tenets are the true measurement of commitment to rural
2 Pennsylvania, not some recitation of facts and figures simply designed to fool the
3 eye. Second, let's actually take Sprint's figures and flesh them out relative to
4 Pennsylvania's demographics. Consider that there are sixty-seven (67) counties
5 in Pennsylvania and that (according to the 2006 census) 66.4 percent of
6 Pennsylvanians live in fifteen (15) of the 67 counties. This would mean that
7 Sprint is providing service to only a portion of the remaining predominantly rural
8 counties. Actually, to meet Sprint's claim to cover 98.3% of Pennsylvanians, they
9 would have to provide service in fifty-seven (57) counties using the same census
10 information. This leaves ten (10) counties (rural) or 14.9% completely unserved
11 by Sprint. And, Sprint achieves much of this service level through roaming
12 agreements, which requires no capital outlay from Sprint itself. And, Sprint
13 achieves much of this service level through roaming agreements, which requires
14 no capital outlay from Sprint itself (*see*, Exhibit DFB-5, response to CTL Sprint
15 V-4).

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18 researched the of Sprint's wireless service availability in several of our exchanges
19 in Pennsylvania. According to Sprint resources (customer care and Sprint
20 website), service was not offered whatsoever in two of the six exchanges in which
21 we requested service. In the remaining four exchanges, Sprint service was
22 provided solely through roaming agreements (*see*, Exhibit DFB-6, Sprint
23 Coverage Tool). Interesting enough, Sprint appears to be discouraging customers

1 from purchasing service in roaming-only areas through a policy that precludes the
2 company from mailing a handset to customers residing in these areas. Additional
3 comments regarding Sprint's "commitment to rural Pennsylvania claims" are
4 including in the Panel Surrebuttal Testimony of Mssrs. Harper and Lindsey.

5 Additionally, Sprint cites its cable partnerships through which it is providing
6 cable telephony service to [BEGIN SPRINT HIGHLY CONFIDENTIAL]
7 [REDACTED] [END SPRINT HIGHLY CONFIDENTIAL] customers in RLEC service
8 territories. Despite repeated efforts by CenturyLink to procure details of these
9 cable agreements through the discovery process, Sprint has consistently refused to
10 provide the contracts. (See, Exhibit DFB-7, responses to CTL-Sprint IV-39 thru
11 IV-42.) This is Sprint's claim, not CenturyLink. Sprint has chosen a litigation
12 strategy of hiding the ball. That is, these are Sprint-negotiated contracts that have
13 not been provided in this case and which are not reviewed or approved by the
14 Commission. And, given that these contracts are negotiated, they presumably can
15 be undone or terminated based upon a business case or change in Sprint's
16 business model.

17
18 The final point I want to add here is this. Regardless of the negotiated contracts
19 that Sprint utilizes regarding this current business strategy, there is nothing
20 holding Sprint's feet to the fire to serve rural Pennsylvania. Sprint does not have
21 COLR/universal service obligations in rural Pennsylvania. If it did, it would have
22 said so. If these secret contracts placed Sprint in the position of ensuring
23 COLR/universal service, I presume Sprint would have cited to those contractual

1 provisions as it has the burden to support its otherwise bald claims of serving rural
2 Pennsylvania and rural Pennsylvanians. Sprint has a competitive advantage.

3

4 Conversely, to the direct and tangible benefit of Pennsylvania's rural consumers,
5 CenturyLink has universal service/COLR obligations in the mostly rural 25
6 counties in which it serves in Pennsylvania. And, CenturyLink is unaware of any
7 Commission Order or rule that would allow CenturyLink to pick and choose
8 where it wants to provide service within its franchised service territory. And,
9 CenturyLink continues to invest tens of millions of dollars in the Commonwealth
10 to meet our broadband deployment commitments under Act 183 of 2004. Sprint
11 and its affiliates do not have any service obligations that they must meet in rural
12 Pennsylvania, particularly if Sprint's cable partners are using VoIP and if they
13 claim VoIP-enabled services are outside the Commission's jurisdictional reach.
14 Sprint and its affiliates are held to an entirely different standard than CenturyLink,
15 which must continue to meet rigid service quality standards for even the most
16 remote, isolated customers.

1 Q. DO YOU AGREE WITH THE STATEMENT IN MR. APPLEBY'S
2 REBUTTAL TESTIMONY (PAGE 3, LINE 10) THAT "RLEC
3 UBIQUITOUS NETWORK OBLIGATIONS ARE NOT BURDENSOME
4 AND ACTUALLY PROVIDE MANY ADVANTAGES AND
5 OPPORTUNITIES?"

6
7 A. No, I do not agree with that statement. The universal service, COLR and
8 ubiquitous broadband requirements shouldered by RLECs, including
9 CenturyLink, promote inefficiencies and result in higher network costs. And, in
10 many of these areas, the investments made by CenturyLink and other RLECs are
11 done so with very little expectation of a positive return on investment, which is
12 why the system of support mechanisms – access charges, universal service funds,
13 subscriber line charges – was originally created and why such mechanisms
14 continue to be of import today.

15
16 In an attempt to better understand Mr. Appleby's points on this matter,
17 CenturyLink propounded a discovery request upon Mr. Appleby in which we
18 asked him to identify each and every a) "network obligation", b) "advantage" and
19 c) "opportunity" to which he was referring in his testimony. Not surprisingly, Mr.
20 Appleby was not able to provide any substantiation for his claims but to defer to
21 his own Rebuttal Testimony (pgs 54-60). (See, Exhibit DFB-9, response to CTL-
22 Sprint 5-1 and 5-2).

1 Upon further review of Mr. Appleby's testimony at these pages, nothing included
2 therein addresses the question asked by CenturyLink. In fact, in that section of
3 testimony, Mr. Appleby demonstrates his and his client's lack of understanding of
4 RLEC COLR obligations when he states: "An RLEC's obligation as carrier of last
5 resort is only triggered when no other provider has facilities to serve a customer."
6 CenturyLink can only wish this were true as it would be a step toward parity in
7 regulation of RLECs and their competitors. The truth of the matter is that
8 CenturyLink and other RLECs need to continually upgrade and maintain their
9 facilities even for customers who have departed our network for the services of
10 another carrier. We have specific service installation requirements with which we
11 must comply, including the installation of 95 percent of our primary service
12 orders completed within 5 working days and 90 percent of our non-primary
13 service orders completed within 20 days.² It is clear from his testimony that Mr.
14 Appleby either doesn't recognize or chooses to ignore these service requirements
15 and the resultant network maintenance required to ensure compliance with these
16 requirements and the provisioning of safe, adequate and reliable regulated service
17 in Pennsylvania.

18
19 Clearly, Sprint's view is misguided. Mr. Appleby's bald and unsupported
20 statements fails to factor in the costs – especially loop costs – into his skewed
21 viewpoint. Loops are expensive to build and to maintain. Costs to an RLEC do
22 not go away as customers leave CenturyLink. Nor, are those costs mitigated, as

² 52 PA Code §63.58. Installation of Service.

1 Mr. Appleby wrongly suggests, by revenues (exclusive of expenses) from
2 additional services provided over the loop. This is the same type of purely
3 theoretical and flawed approach taken by Mr. Appleby concerning other points in
4 his Rebuttal and Direct Testimonies.

5

6 **Q. IN HIS TESTIMONY (PAGE 57, LINES 10-16) MR. APPLEBY REFERS**
7 **TO THE ABILITY OF CENTURYLINK TO CHARGE A LINE**
8 **EXTENSION FEE FOR NEW SERVICE AS “COLR COST**
9 **DEFRAYMENT OPPORTUNITY”. CAN YOU COMMENT ON THIS**
10 **STATEMENT?**

11 **A.** Yes. CenturyLink and other ILECs have the ability through their tariffs to charge
12 customers a line extension fee for facilities placed on private property. What Mr.
13 Appleby fails to mention is that there is no charge to the customer for the first
14 1,000 feet of construction and that it is the company’s responsibility to “construct,
15 maintain and own the facilities between the public road facilities and the
16 applicant’s main service location.”³ Only if the distance between the public road
17 facilities and the applicant’s main service location is more than 1,000 feet can
18 CenturyLink charge the customer for such construction costs. This hardly
19 amounts to a “COLR cost defrayment opportunity” as Mr. Appleby suggests.

³ The United Telephone Company of Pennsylvania Tariff, Supplement No. 237, Section 3.

1 Q. HOW WILL THIS COMMISSION KNOW THAT THE CLAIMED
2 BENEFITS THAT ARE ASSUMED TO FLOW AS A RESULT OF THE
3 ACCESS REDUCTIONS PARTIES SEEK WILL INURE TO THE
4 CONSUMERS IN RURAL PENNSYLVANIA?

5 A. The Commission would not know whether the alleged benefits of RLEC access
6 reductions will inure to rural Pennsylvania or in Pennsylvania at all. Take
7 Verizon, for example. Verizon has made no commitment to reduce any of its
8 rates. Verizon's approach is like those of the other seeking access reductions –
9 the market will somehow presumably flow through access rate benefits to
10 consumers in Pennsylvania. The presumption that once may have been true, is no
11 longer the case. Competition will not ensure flow through as once thought given
12 the lack of stand alone IXCs and the lack of stand alone long distance plans. And,
13 even if there is a minimal benefit, these parties have not quantified the assumed
14 benefit. It could be pennies per month or a fraction of that. The point is that they
15 are claiming benefits but have not undertaken any analysis or support that in
16 Pennsylvania the reductions in access rates are significant so that the Commission
17 can make a finding of net consumer benefits.

18
19 Actually, if Verizon like the others claiming benefits were serious about flow
20 through, such a demonstration is actually more manageable today than once was
21 the case given the decline in the interexchange market. At year end 2008, for
22 example, Verizon's certificated CLEC, namely MCImetro Access Transmission
23 Services LLC, d/b/a Verizon Access ("Verizon Access"), had [BEGIN VZ

1 **CONFIDENTIAL** [REDACTED] **[END VZ CONFIDENTIAL]** (EQ-
2 VZ 1-5). Verizon's IXC affiliate, namely MCI Communications, d/b/a Verizon
3 Business Services ("Verizon Business"), had **[BEGIN VZ CONFIDENTIAL]**
4 [REDACTED]. **[END VZ CONFIDENTIAL]** (EQ-VZ 1-7). (The entity
5 "Verizon LD", which it is assumed is the long distance arm of Verizon the ILEC
6 providing long distance service in Verizon the ILEC's territory, had
7 approximately **[BEGIN VZ CONFIDENTIAL]** [REDACTED]. **[END**
8 **VZ CONFIDENTIAL]** (EQ-VZ 1-7).

9
10 **Q. CAN YOU COMMENT ON AT&T'S FLOW THROUGH OF ACCESS**
11 **REDUCTIONS IN NEW JERSEY AS A RESULT OF THE BOARD'S**
12 **ORDER TO MIRROR INTRASTATE AND INTERSTATE SWITCHED**
13 **ACCESS RATES?**

14 **A.** Yes. AT&T did implement a 36% reduction in its In-State Connection Fee in
15 conjunction with the New Jersey Board's Order in that proceeding. However, just
16 like in this case, when asked to quantify that reduction or identify the number of
17 customers that will benefit from such a reduction, AT&T cannot produce
18 quantifiable results. Hence, there is no credible evidence that this "benefit" is
19 meaningful in New Jersey or anywhere else. In responding to questions on this
20 matter, AT&T once again defaults to their "competition will produce benefits for
21 consumers" argument and "presumably all consumers will benefit" stance to
22 support access reductions. And, as discussed below, when asked to provide
23 documentation of flow through from previous intrastate switched access rate

1 reductions in PA (as required by the Commission in the *Global Order*), AT&T
2 cannot produce any such documentation. (*See*, Exhibit DFB-9, ATT Supplemental
3 Response to CTL-ATT 2-31.) As a point of emphasis on this matter, Verizon
4 traffic represents over 70% of the Commonwealth's intrastate switched access
5 volume (based on 2008 data) (*see*, **confidential** Exhibit DFB-10, ATT Response
6 to CTL-ATT III-5). Even though Verizon PA mirrored its interstate rates several
7 years ago, there has been little or no flow through to either long distance rates or
8 the instate access recovery charge of the IXC's in conjunction with Verizon's
9 intrastate access rate reductions.

10

11 **Q. HAS SPRINT BEEN ABLE TO DOCUMENT FLOW THROUGH TO**
12 **CONSUMERS OF PREVIOUS ACCESS REDUCTIONS IN PA?**

13 A. Very simply, no. (*See*, Exhibit DFB-11, Supplemental Response to CTL-Sprint 2-
14 18).

15

16 **Q. DO YOU HAVE ANY OTHER FINAL COMMENTS ABOUT THE**
17 **ALLEGED BENEFITS ARISING FROM ACCESS REDUCTIONS AS**
18 **CLAIMED BY THE PARTIES?**

19 A. Yes. CenturyLink does not believe flow through is a "red herring" as parties have
20 claimed. The issue of benefits to consumers is a material and relevant issue. The
21 parties seeking intrastate switched access reductions assert that benefits will flow
22 through to consumers. Yet, even though they are the ones seeking the relief of
23 access reduction and they claim benefits will arise due to reductions, yet, as

1 discussed above, they have not shown how in the past they have flowed through
2 the benefits of prior Commission access reductions. Some of these parties have
3 submitted letters to the Commission claiming why they could not or should not be
4 required to demonstrate the benefits of access reductions that this Commission
5 factored into the quid pro quo of the *Global Order* in 1999. Yet, they come to
6 this Commission today claiming significant consumer benefits resulting from
7 access reductions; never mind the fact that they provide not a scintilla of credible
8 evidence in support of their claims, but rather choose to rely upon a “trust us”
9 argument. The Commission should see the transparency of this ploy just as they
10 should clearly see that the lack of showing is hardly a “red herring.”

11

12 **Q. CAN YOU COMMENT ON MR. APPLEBY’S COMMENTS IN HIS**
13 **REBUTTAL TESTIMONY (PAGES 72-74) REGARDING RETROACTIVE**
14 **RATE RELIEF?**

15 A. Yes. I will simply reiterate my statement from my Direct Testimony (p. 23, lines
16 1-5) that the Commission should outright reject the claims of any party that
17 retroactive rate relief is appropriate or required. It is not.

18

19 **V. AT&T’S POSITION ON ACCESS REFORM IN OTHER STATES**

20 **Q. DOES AT&T’S POSITION IN THIS PROCEEDING DIFFER FROM ITS**
21 **POSITION ON ACCESS REFORM IN OTHER STATES?**

22 A. Yes. Most notably, AT&T directly contradicts its position in this proceeding in
23 those states where it operates as an Incumbent Local Exchange Carrier (ILEC).

1 As a result of the AT&T/SBC merger, AT&T operates as an ILEC in 22 states. In
2 10 of those 22 states, AT&T's intrastate access rates are significantly higher than
3 their interstate rate. In an additional 4 states, intrastate rates are closer to
4 interstate rates, but they certainly do not mirror those rates as AT&T is asking
5 here.

6
7 **Q. ANY ADDITIONAL EXAMPLES OF WHERE AT&T'S POSITIONS**
8 **DIFFER?**

9 **A.** Yes. In Texas, AT&T supported the move toward mirroring of intra and
10 interstate rates, but only with the support from a \$100 million per year state USF.
11 And in Kansas, AT&T supported a gradual transition to mirroring with the
12 support from a state USF. This is significantly different than the approach to
13 mirroring that AT&T is advocating here in Pennsylvania.

14
15 **Q. IS REVENUE NEUTRAL REBALANCING A GUARANTEE OF**
16 **REVENUES FOR CENTURYLINK AND OTHER RLECs?**

17 **A.** No, it is not. Revenue neutral rebalancing is an adjustment to rates ensuring that,
18 at the point in time when it occurs, CenturyLink and other RLEC's are not
19 directly harmed by any decision to reduce access rates. Once the rebalancing
20 occurs, CenturyLink and other rural carriers will still need to compete to maintain
21 revenue levels. Considering the amount of competition in today's environment
22 and rate of access line loss by CenturyLink and others, there is no such thing as a
23 "revenue guarantee."

1 Q. DOES THIS CONCLUDE YOUR SURREBUTTAL TESTIMONY?

2 A. Yes.

CTL-Comcast 3-5 Provide all documents, studies, analyses undertaken by or on behalf of Comcast determining that CenturyLink and the RLECs can continue to both price competitively and recover its costs under Comcast's proposal.

RESPONSE: Comcast does not propose how CenturyLink should set prices for competitive services.

Respondent: Michael D. Pelcovits

Position: Consultant

CTL-Comcast 3-6 Does Mr. Pelcovits maintain that there are no disadvantages from reducing intrastate switched access rates as proposed by Comcast in this proceeding? If there are disadvantages, identify and explain each, quantify, to the extent possible, and provide all documents, studies, and analyses relied upon by Mr. Pelcovits.

RESPONSE: See response to CTL-Comcast 2-7. Dr. Pelcovits does not contend that there are no disadvantages, from CenturyLink's perspective, from reducing intrastate switched access rates to cost. Dr. Pelcovits has not examined what those disadvantages might be. No responsive documents, studies, or analyses, therefore, exist.

Respondent: Michael D. Pelcovits

Position: Consultant

CTL-Comcast 3-7 If there are disadvantages from intrastate switched access rate reductions, provide all documents, studies, and analyses to determine and quantify that the alleged benefits or advantages of such access rate reductions exceed the costs or disadvantages.

RESPONSE: Please see the response to CTL-Comcast 3-6.

Respondent: Michael D. Pelcovits

Position: Consultant

CTL-Comcast 3-8 Reference page 11, lines 12-16. Identify all stand-alone long distance calling plans offered or provided by Comcast or any affiliate thereof. Provide all tariff citations.

RESPONSE: Respondents objected to this Interrogatory on several grounds. Without waiver of these objections and to the extent Respondents have not objected to this Interrogatory, Respondents provide the following response:

None. Please see the response to CTL-Comcast 1-10.

Respondent: Elizabeth Murray

Position: Senior Director of Regulatory Affairs
Eastern Division
Comcast Cable Communications, Inc.

CTL-Comcast 3-9 Reference page 12, line 10. Identify and specify in detail the product and geographic markets for the “competition” that Mr. Pelcovits claims will be affected.

RESPONSE: The product and geographic markets consist of the stand-alone or bundled services provided by the RLECs’ customers for which they are now recovering above-cost intrastate switched access charges.

Respondent: Michael D. Pelcovits

Position: Consultant

CTL-Comcast 3-10 Reference page 12, line 10. Identify and specify in detail the product and geographic markets relative to CenturyLink in particular for the "competition" that Mr. Pelcovits claims will be affected.

RESPONSE: The product and geographic markets consist of the stand-alone or bundled services provided to the CenturyLink customers for which CenturyLink is now recovering above-cost intrastate switched access charges.

Respondent: Michael D. Pelcovits

Position: Consultant

Exhibit DFB-4

RESPONSE OF AT&T COMMUNICATIONS OF PENNSYLVANIA, LLC., TCG NEW JERSEY, INC. AND TCG PITTSBURGH TO CENTURYLINK'S SET IV DATA REQUESTS DATED MARCH 18, 2010, DOCKET NOS. C-2009-2098380 ET AL. AND I-00040105

CTL-ATT 4-2: Reference pages 20 (line 10) to page 21 (line10) regarding the benchmark rates now proposed by AT&T. Provide any all elasticity studies undertaken by or on behalf of AT&T. Provide all documents in support.

Sponsored by: E. Christopher Nurse and Dr. Ola Oyefusi

Response: See AT&T's responses to PTA-ATT 4-7 and 4-8 and CTL-ATT-3-6.

RESPONSE OF AT&T COMMUNICATIONS OF PENNSYLVANIA, LLC., TCG NEW JERSEY, INC. AND TCG PITTSBURGH TO CENTURYLINK'S THIRD SET OF DATA REQUESTS DATED March 11, 2010, DOCKET NOS. C-2009-2098380 ET AL. AND I-00040105

CTL-ATT 3-6 Provide a copy of all documents and studies reviewing or analyzing elasticity of demand, as undertaken by AT&T or on behalf of AT&T: (a) regarding actual or potential rate changes relative to bundled services offered by CenturyLink in Pennsylvania; and (b) regarding actual or potential rate changes relative to any local retail services offered by CenturyLink in Pennsylvania. Identify the specific rates and services. Provide study results and all documents and workpapers reviewed and analyzed.

Sponsored by: E. Christopher Nurse and Dr. Ola Oyefusi

Response: Subject to and without waiver of AT&T's General Objections, AT&T responds as follows:

AT&T has not conducted any such studies, nor would such studies be useful given the availability of actual CenturyLink experiences from other jurisdictions. See AT&T's Panel Rebuttal Testimony of March 10, 2010 at pp. 40-45. CenturyLink substantially increased local exchange prices in Virginia and New Jersey once it requested and received the regulatory latitude to do so. That experience is relevant and pertinent to CenturyLink in Pennsylvania as predictive of the changes in demand CenturyLink could expect after increasing its Pennsylvania prices. Indeed, such data would be far more instructive than the so-called "consumer survey" CenturyLink interjected into this case in its effort to avoid addressing its actual experience in other states, but CenturyLink has refused to provide such New Jersey and Virginia data to AT&T. As CenturyLink's witness Dr. Staihr has himself testified, price is not the only indicator of how consumers will act. If CenturyLink truly believed that basic exchange service is as price elastic as it argues here, it is unlikely CenturyLink would have implemented the price increases it did. In other words, CenturyLink's real world experience appears to be much different than its theories and survey results.

Exhibit DFB-4

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PTA-ATT-4-7: Reference to AT&T Statement 1.2 at 21. Fully and completely state whether or not the witnesses expects any loss of customers to occur if the RLECs increase local rates from current levels to those recommended by AT&T. Please provide any and all documents related thereto.

Response: See AT&T's response to CTL-3-6. RLECs have raised prices in the past, both in Pennsylvania and elsewhere, yet have put forward no evidence regarding how those price changes have affected demand, if at all. There is simply no evidence from the RLECs regarding real world experiences demonstrating that past price increases have led to loss of customers based solely on the increased price.

The regulatory market treatment has changed. Virtually all RLECs have chosen to be regulated via some form of price cap plans rather than through full, rate-of-return regulation. This means that RLECs are no longer guaranteed a certain level of revenues, nor should they continue to receive perpetual subsidy streams from their competitors. The onus is now on the RLECs to provide a mix of products and services that consumers want at prices they are willing to pay. They must compete based on their own efficiencies and ability to meet challenges in the competitive market. There is no guarantee under price cap regulation that the firm will be more profitable, profitable at all, or even will continue. The Commission should not make policy decisions designed to ensure RLECs are "protected" from competitive losses. Rather, the Commission should ensure that there are not artificial regulatory market distortions that harm the competitive marketplace.

The RLECs themselves have recognized that line losses are occurring simply because of competitive conditions and are due to reasons unrelated to price increases, and in some cases, line losses are to their own competitors or competitive services. This migration to broadband was an intended purpose of Chapter 30 network modernization. See *e.g.* D&E Year End 2007 10K:

Page 8

Our total RLEC lines decreased as a result of various factors that reflect industry trends, including the use of wireless service in place of second lines and, in some cases, primary lines, the move to VoIP service and the use of alternative telecommunication services. The number of access lines served by our CLEC has increased from 43,720 access lines as of December 31, 2006 to 46,002 as of December 31, 2007. We believe that market demand for an alternative communications provider, combined with our sales efforts and quality reputation, will contribute to continued CLEC access line growth.

Page 22

One of the critical drivers in the communications industry today is the convergence of voice and data communication technologies into various IP based platforms, all of which have the potential to provide VoIP, broadband services, and IP video over telephone companies' copper and fiber networks, cable companies' coaxial and fiber networks, wireless telephone companies' wireless networks and satellite companies' satellite networks. Although each of the networks has relative strengths and weaknesses, they are all effectively in competition for customers' communications needs. These developments mean that we are competing for our existing customer base in our RLEC and CLEC territories with cable TV companies, wireless telephone companies, satellite communications providers and VoIP providers. *The recent decreases in the number of access lines in our RLEC territories reflect such increased competition, in addition to the elimination of lines by our customers as they shift to DSL for high-speed Internet access. These*

Exhibit DFB-4

RESPONSE OF AT&T COMMUNICATIONS OF PENNSYLVANIA, LLC., TCG NEW JERSEY, INC. AND
TCG PITTSBURGH TO PTA'S SET IV DATA REQUESTS DATED MARCH 15, 2010, DOCKET NOS. C-
2009-2098380 *ET. AL.* AND 1-00040105

*developments have placed our core telephone business at risk, although also enabling us to
compete in the provision of cable TV services.* [Emphasis added].

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PTA-ATT-4-7: Reference to AT&T Statement 1.2 at 21. Fully and completely state whether or not the witnesses expects any loss of customers to occur if the RLECs increase local rates from current levels to those recommended by AT&T. Please provide any and all documents related thereto.

Response: See AT&T's response to CTL-3-6. RLECs have raised prices in the past, both in Pennsylvania and elsewhere, yet have put forward no evidence regarding how those price changes have affected demand, if at all. There is simply no evidence from the RLECs regarding real world experiences demonstrating that past price increases have led to loss of customers based solely on the increased price.

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PTA-ATT-4-8: Reference to AT&T Statement 1.2 at 21. Provide full and complete copies of any and all studies or other analyses undertaken by AT&T to determine the level of RLEC customer migration to other service providers were the local rate increases identified by AT&T implemented.

Sponsored by: E. Christopher Nurse and Dr. Ola Oyefusi

Response: See responses to CTL-ATT-3-6 and PTA-ATT-4-7. Further, in order to rely on actual experience rather than hypothetical speculation, AT&T asked PTA as well as CenturyLink various times to provide details regarding actual price increases and the number of customers that existed before and after the price increases, and information about any elasticity studies, analyses, performed or reviewed by PTA or by CenturyLink but none were provided (other than CenturyLink's "customer survey," in its testimony that was highly flawed, and should be disregarded for the reasons we provided in our March 10, 2010 Rebuttal Testimony). If it is the RLECs' position that they cannot survive in a competitive market by relying on revenues from their own customers, then the RLECs can certainly seek other ways to decrease their costs just as all competitors must do.

Exhibit DFB-4

RESPONSE OF AT&T COMMUNICATIONS OF PENNSYLVANIA, LLC., TCG NEW JERSEY, INC. AND TCG PITTSBURGH TO CENTURYLINK'S SET IV DATA REQUESTS DATED MARCH 18, 2010, DOCKET NOS. C-2009-2098380 ET AL. AND I-00040105

CTL-ATT 4-3: Reference pages 20 (line 10) to page 21 (line10) regarding the benchmark rates now proposed by AT&T. Provide any and all affordability studies or analyses undertaken by or on behalf of AT&T concerning those benchmarks. Provide all documents in support.

Sponsored by: E. Christopher Nurse and Dr. Ola Oyefusi

Response: The witnesses rely on their extensive industry experience and expertise, as well as general industry knowledge. AT&T reviewed and analyzed the affordability analysis presented by the Office of Consumer Advocate in the USF/rate cap case before ALJ Colwell, which yields an affordability range of \$23.43-\$34.34/month. See our Panel Rebuttal Testimony at pp. 9-12 and the cites therein. We also relied on information provided by CenturyLink regarding the amounts its customers are paying, and the fact that its customers are moving towards more expensive bundles.

Exhibit DFB-4

RESPONSE OF AT&T COMMUNICATIONS OF PENNSYLVANIA, LLC., TCG NEW JERSEY, INC. AND TCG PITTSBURGH TO CENTURYLINK'S SET IV DATA REQUESTS DATED MARCH 18, 2010, DOCKET NOS. C-2009-2098380 ET AL. AND I-00040105

CTL-ATT 4-4: Reference pages 20 (line 10) to page 21 (line10) regarding the benchmark rates now proposed by AT&T. Provide any and all documents reviewed or relied upon by AT&T's witnesses in determining the affordability of AT&T's proposed benchmark rates.

Sponsored by: E. Christopher Nurse and Dr. Ola Oyefusi

Response: See response to CTL-ATT 4-3.

Exhibit DFB-4

RESPONSE OF AT&T COMMUNICATIONS OF PENNSYLVANIA, LLC., TCG NEW JERSEY, INC. AND TCG PITTSBURGH TO CENTURYLINK'S SET IV DATA REQUESTS DATED MARCH 18, 2010, DOCKET NOS. C-2009-2098380 ET AL. AND I-00040105

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CTL-ATT 4-5: Reference pages 20 (line 10) to page 21 (line10) regarding the benchmark rates now proposed by AT&T. Did AT&T, or any person or entity on behalf of AT&T, examine or estimate the impact on customer line losses for CenturyLink if the Commission adopts AT&T's proposal as set forth in the March 10, 2010 rebuttal testimony and CenturyLink raises its rates to the benchmark? Or, conversely, has AT&T calculated how much PA USF CenturyLink will lose if it does not raise rates? If yes, please provide the amount. Provide all documents, workpapers, studies, and analyses.

Sponsored by: E. Christopher Nurse and Dr. Ola Oyefusi

Response: Please see AT&T responses to CTL-ATT 3-6, PTA-ATT-4-7, & PTA-ATT-4-8. There is no requirement for CenturyLink to raise rates in order to obtain transitional funding from the PA USF. See corrected Attachment 5 to AT&T's Panel Rebuttal Testimony for exact revenue replacement funding from local rate increases to the benchmark level versus additional, transitional PA USF support.

RESPONSE OF AT&T COMMUNICATIONS OF PENNSYLVANIA, LLC., TCG NEW JERSEY, INC. AND TCG PITTSBURGH TO CENTURYLINK'S THIRD SET OF DATA REQUESTS DATED March 11, 2010, DOCKET NOS. C-2009-2098380 ET AL. AND I-00040105

CTL-ATT 3-6 Provide a copy of all documents and studies reviewing or analyzing elasticity of demand, as undertaken by AT&T or on behalf of AT&T: (a) regarding actual or potential rate changes relative to bundled services offered by CenturyLink in Pennsylvania; and (b) regarding actual or potential rate changes relative to any local retail services offered by CenturyLink in Pennsylvania. Identify the specific rates and services. Provide study results and all documents and workpapers reviewed and analyzed.

Sponsored by: E. Christopher Nurse and Dr. Ola Oyefusi

Response: Subject to and without waiver of AT&T's General Objections, AT&T responds as follows:

AT&T has not conducted any such studies, nor would such studies be useful given the availability of actual CenturyLink experiences from other jurisdictions. See AT&T's Panel Rebuttal Testimony of March 10, 2010 at pp. 40-45. CenturyLink substantially increased local exchange prices in Virginia and New Jersey once it requested and received the regulatory latitude to do so. That experience is relevant and pertinent to CenturyLink in Pennsylvania as predictive of the changes in demand CenturyLink could expect after increasing its Pennsylvania prices. Indeed, such data would be far more instructive than the so-called "consumer survey" CenturyLink interjected into this case in its effort to avoid addressing its actual experience in other states, but CenturyLink has refused to provide such New Jersey and Virginia data to AT&T. As CenturyLink's witness Dr. Staihr has himself testified, price is not the only indicator of how consumers will act. If CenturyLink truly believed that basic exchange service is as price elastic as it argues here, it is unlikely CenturyLink would have implemented the price increases it did. In other words, CenturyLink's real world experience appears to be much different than its theories and survey results.

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PTA-ATT-4-7: Reference to AT&T Statement 1.2 at 21. Fully and completely state whether or not the witnesses expects any loss of customers to occur if the RLECs increase local rates from current levels to those recommended by AT&T. Please provide any and all documents related thereto.

Response: See AT&T's response to CTL-3-6. RLECs have raised prices in the past, both in Pennsylvania and elsewhere, yet have put forward no evidence regarding how those price changes have affected demand, if at all. There is simply no evidence from the RLECs regarding real world experiences demonstrating that past price increases have led to loss of customers based solely on the increased price.

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Sponsored by: E. Christopher Nurse and Dr. Ola Oyefusi

Response: See responses to CTL-ATT-3-6 and PTA-ATT-4-7. Further, in order to rely on actual experience rather than hypothetical speculation, AT&T asked PTA as well as CenturyLink various times to provide details regarding actual price increases and the number of customers that existed before and after the price increases, and information about any elasticity studies, analyses, performed or reviewed by PTA or by CenturyLink but none were provided (other than CenturyLink's "customer survey," in its testimony that was highly flawed, and should be disregarded for the reasons we provided in our March 10, 2010 Rebuttal Testimony). If it is the RLECs' position that they cannot survive in a competitive market by relying on revenues from their own customers, then the RLECs can certainly seek other ways to decrease their costs just as all competitors must do.

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CTL-ATT 4-6: Did AT&T, or any person or entity on behalf of AT&T, examine or estimate the impact on customer line losses, for CenturyLink, if the Commission adopts AT&T's proposal in any other aspect? Provide all documents, workpapers, studies, and analyses.

Sponsored by: E. Christopher Nurse and Dr. Ola Oyefusi

Response: See response to CTL-ATT 4-5.

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CTL-ATT 4-5: Reference pages 20 (line 10) to page 21 (line10) regarding the benchmark rates now proposed by AT&T. Did AT&T, or any person or entity on behalf of AT&T, examine or estimate the impact on customer line losses for CenturyLink if the Commission adopts AT&T's proposal as set forth in the March 10, 2010 rebuttal testimony and CenturyLink raises its rates to the benchmark? Or, conversely, has AT&T calculated how much PA USF CenturyLink will lose if it does not raise rates? If yes, please provide the amount. Provide all documents, workpapers, studies, and analyses.

Sponsored by: E. Christopher Nurse and Dr. Ola Oyefusi

Response: Please see AT&T responses to CTL-ATT 3-6, PTA-ATT-4-7, & PTA-ATT-4-8. There is no requirement for CenturyLink to raise rates in order to obtain transitional funding from the PA USF. See corrected Attachment 5 to AT&T's Panel Rebuttal Testimony for exact revenue replacement funding from local rate increases to the benchmark level versus additional, transitional PA USF support.

RESPONSE OF AT&T COMMUNICATIONS OF PENNSYLVANIA, LLC., TCG NEW JERSEY, INC. AND TCG PITTSBURGH TO CENTURYLINK'S THIRD SET OF DATA REQUESTS DATED March 11, 2010, DOCKET NOS. C-2009-2098380 ET AL. AND I-00040105

CTL-ATT 3-6 Provide a copy of all documents and studies reviewing or analyzing elasticity of demand, as undertaken by AT&T or on behalf of AT&T: (a) regarding actual or potential rate changes relative to bundled services offered by CenturyLink in Pennsylvania; and (b) regarding actual or potential rate changes relative to any local retail services offered by CenturyLink in Pennsylvania. Identify the specific rates and services. Provide study results and all documents and workpapers reviewed and analyzed.

Sponsored by: E. Christopher Nurse and Dr. Ola Oyefusi

Response: Subject to and without waiver of AT&T's General Objections, AT&T responds as follows:

AT&T has not conducted any such studies, nor would such studies be useful given the availability of actual CenturyLink experiences from other jurisdictions. See AT&T's Panel Rebuttal Testimony of March 10, 2010 at pp. 40-45. CenturyLink substantially increased local exchange prices in Virginia and New Jersey once it requested and received the regulatory latitude to do so. That experience is relevant and pertinent to CenturyLink in Pennsylvania as predictive of the changes in demand CenturyLink could expect after increasing its Pennsylvania prices. Indeed, such data would be far more instructive than the so-called "consumer survey" CenturyLink interjected into this case in its effort to avoid addressing its actual experience in other states, but CenturyLink has refused to provide such New Jersey and Virginia data to AT&T. As CenturyLink's witness Dr. Staihr has himself testified, price is not the only indicator of how consumers will act. If CenturyLink truly believed that basic exchange service is as price elastic as it argues here, it is unlikely CenturyLink would have implemented the price increases it did. In other words, CenturyLink's real world experience appears to be much different than its theories and survey results.

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Sponsored by: E. Christopher Nurse and Dr. Ola Oyefusi

Response: See responses to PTA-ATT-4-7 and PTA-ATT-4-8 and CTL-ATT-3-6.

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CTL-ATT 4-8: Reference pages 20 (line 10) to page 21 (line10) regarding the benchmark rates now proposed by AT&T. Provide all documents, studies and analyses undertaken by or on behalf of AT&T examining whether those benchmarks are sustainable or viable in CenturyLink's service territory.

Sponsored by: E. Christopher Nurse and Dr. Ola Oyefusi

Response: See AT&T's responses to PTA-ATT-4-7 and PTA-ATT-4-8 and CTL-ATT-4-3. By way of further answer, the benchmark proposed by AT&T is certainly appropriate when compared to other local rates actually being charged, for example in the neighboring state of New York with local rates at \$23 per month, including both rural and urban exchanges and carriers. Another example is CenturyLink's own local rate that it charges in Wyoming which is as high as \$28, depending on zone. See also AT&T Statement 1.2, pages 10 & 11 regarding much higher monthly rates customers are paying on average today for their communications services and PTA's response to ATT-PTA 5-12 also showing monthly rates offered by other competitive providers. Of course, as Dr. Staihr himself has previously testified, price is but one factor in the customer's purchasing decision alongside various other factors like service quality, customer service, features & functionalities and innovation to name a few.

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CTL-ATT 4-3: Reference pages 20 (line 10) to page 21 (line10) regarding the benchmark rates now proposed by AT&T. Provide any and all affordability studies or analyses undertaken by or on behalf of AT&T concerning those benchmarks. Provide all documents in support.

Sponsored by: E. Christopher Nurse and Dr. Ola Oyefusi

Response: The witnesses rely on their extensive industry experience and expertise, as well as general industry knowledge. AT&T reviewed and analyzed the affordability analysis presented by the Office of Consumer Advocate in the USF/rate cap case before ALJ Colwell, which yields an affordability range of \$23.43-\$34.34/month. See our Panel Rebuttal Testimony at pp. 9-12 and the cites therein. We also relied on information provided by CenturyLink regarding the amounts its customers are paying, and the fact that its customers are moving towards more expensive bundles.

Exhibit DFB-4

Investigation Regarding Intrastate Access Charges and
IntraLATA Toll Rates of Rural Carriers and
The Pennsylvania Universal Service Fund, Docket No. I-00040105

AT&T Communications of Pennsylvania, LLC, *et al.*
v. Armstrong Telephone Company - Pennsylvania, *et al.*
Docket No. C-2009-2098380, *et al.*

Interrogatories of ATT - Set V
Answers of the Pennsylvania Telephone Association

Person Answering: Gary Zingaretti

AT&T-PTA-5-12: Referencing page 44 lines 14-19 and page 45 lines 1-2 of PTA's January 20, 2010 testimony, which claims that it is in AT&T's, Sprint's, Verizon's and Comcast's interest to gain more customers were RLEC rates to be priced above the market price, please provide the following information:

- (a) What does PTA consider to be the "market price" for each PTA company's basic local service rates?
- (b) Please identify any competitive basic local service alternatives provided by competitors, and identify each competitor, the service(s), their service price points, and dates for which those service price points were effective.
- (c) Please provide any available examples where any PTA company has reduced prices for basic local service in response to competitive offers during the past 3 years, and provide the name of the PTA company, the date of the reduction, a description of the specific service or services for which prices were reduced, an explanation of the reasons why such prices were reduced, and the price(s) for each such service before and after that reduction.

Response:

- (a) The PTA Companies use of the term "market price" is intended to be indicative of the general market for substitutable telephone service in the areas in which they serve. The fact that many of the PTA companies have not used banked revenues resulting from the operation of alternative regulation would strongly indicate that they feel they are currently at the market price. See (b) below for additional data on market rates.
- (b) Wireless companies, competitive LECs, and VoIP providers are the primary competitors serving RLEC markets. Wireless rates and services are available on their websites. Competitive LEC rates are available in their tariffs on file with the PA PUC.

Exhibit DFB-4

Investigation Regarding Intrastate Access Charges and
IntraLATA Toll Rates of Rural Carriers and
The Pennsylvania Universal Service Fund, Docket No. I-00040105

AT&T Communications of Pennsylvania, LLC, *et al.*
v. Armstrong Telephone Company - Pennsylvania, *et al.*
Docket No. C-2009-2098380, *et al.*

Interrogatories of ATT - Set V
Answers of the Pennsylvania Telephone Association

Attached are several web site price and service descriptions for companies serving the RLEC markets. The PTA companies do not know when these rates were effective.

- (c) No PTA Company has reduced prices for basic local service in response to competitive offers in the last three (3) years.



Individual Plans

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Build a plan that'll keep you and your wallet happy.

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Friends & Family.†

Save minutes and money. Unlimited calling to 5 out-of-network numbers, even landlines, on any Nationwide Plan with 900 Anytime Minutes or more. All at no extra cost.

The best value in wireless is only on the network.

Nationwide Single-Line Plans

Anytime Minutes	Talk & Text* <small>monthly access</small>	Talk <small>monthly access</small>	Friends & Family†	Per-Minute Rate After Allowance†
450	\$59.99	\$39.99	—	45¢
900	\$79.99	\$59.99	Pick 5 Friends	40¢
Unlimited**	\$89.99	\$69.99	—	—

Data Packages

Device Type	Monthly Access Per Line	Data Allowance	Per-MB Rate
Simple Feature Phones	—	Pay per use	\$1.99
Simple Feature or 3G Multimedia Phones	\$9.99	25 MB	20¢ after allowance
Simple Feature, 3G Multimedia or 3G Smartphones	\$29.99	Unlimited	—

Data package of \$9.99 or higher required for 3G Multimedia Phones. All 3G Smartphones require a data feature of \$29.99 or higher, or a data plan

Messaging Only Plans

Unlimited messaging without voice minutes for one low monthly price.

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Push to Talk



Unlimited 1-to-1 and Group Push to Talk calling.

[Shop Now](#)

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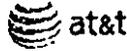
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[Nationwide plus Canada](#)

[View All Calling Plans](#)

Individual Cell Phone Plans starting at \$39.99 with activation - Wireless... <http://www.wireless.att.com/cell-phone-service/cell-phone-plans/indi...>

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AT&T, the nation's fastest 3G Network, offers a variety of individual cell phone plans where you'll enjoy:

- Unlimited calling to other AT&T wireless customers with Mobile to Mobile while in the U.S.
- No roaming or long distance charges in the U.S.
- Saving unused minutes with Rollover®
- Unlimited calling on Nights and Weekends for most plans

Get live help placing your order. [Chat Now!](#)

To order by phone, call 1-866-333-6631 (special online pricing and some devices may not be available)

On the road again? Check out our national coverage in areas you plan to visit:

- ▶ [View national map](#)
- ▶ [View Canada map](#)

Nation Plans

Minutes	Monthly Cost	Rollover®	Unlimited Nights/Weekends*	Unlimited Mobile to Mobile	Additional Details
450	\$38.99	✓	Includes 5000	✓	View Details
900	\$59.99	✓	✓	✓	View Details
Unlimited	\$69.99	✓	✓	✓	View Details

Nation with Canada Plans

No long distance or roaming charges for voice calls between the US and Canada and a data pay-per-use rate of \$2/MB in Canada.

Minutes (U.S. + Canada)	Monthly Cost	Rollover®	Included Nights/Weekends (U.S. + Canada)	Unlimited Mobile to Mobile in the U.S.**	Additional Details
450	\$59.99	✓	Includes 1000	✓	View Details
900	\$78.99	✓	Includes 1000	✓	View Details
1350	\$99.99	✓	Includes 1000	✓	View Details
2000	\$119.95	✓	Includes 1000	✓	View Details
4000	\$169.99	✓	Includes 1000	✓	View Details
6000	\$219.99	✓	Includes 1000	✓	View Details

** Mobile to Mobile only applies to calls made and received while in the U.S., Puerto Rico, and U.S.V.I.

Senior Plan - Available to customers 65 and older.

Minutes	Monthly Cost	Rollover®	Unlimited Nights/Weekends*	Unlimited Mobile to Mobile	Additional Details
200	\$29.99	✓	Includes 500	✓	View Details Must be 65 or older Verified at checkout

*Night and Weekend minutes will be used before Mobile to Mobile minutes. Unlimited weekday minutes from 9pm to 6am and unlimited minutes on weekends.

[Other Monthly Charges](#) | [Plan Terms](#) | [Online Pricing](#) | [Return Policy](#)
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You are shopping in Harrisburg, PA 17101

The list of plans has been filtered based on the criteria below. To see a full list of plans, click Reset below.

Narrow My List > Direct Connect Individual Share Mobile Broadband Any Mobile, Anytime™

Simply Everything™

Everything your phone, PDA or smartphone can do nationwide - unlimited text, surf, email, listen, watch, find and of course, talk - on one simple plan.

This plan includes

Unlimited data: Web surfing, email, BlackBerry Internet Services (BIS), GPS Navigation, Music Premier, TV Premier, NFL Mobile Live, NASCAR Sprint Cup Mobile™

Unlimited Direct Connect: Direct Connect and Group Connect (for capable phones)

Unlimited messaging: Text, pictures and video

Unlimited talk: Unlimited anytime minutes, nationwide long distance and no roaming charges

More about what's included in this plan

Everything Data with Any Mobile, Anytime™

\$69.99

The competition just can't measure up

You do everything



Anytime Minutes

Monthly Price

Additional Anytime Minutes



Unlimited

\$99.99

Unlimited

Select

Everything Data - with Any Mobile, Anytime™

Introducing Any Mobile, Anytime, forget about restrictive calling circles. Our Everything Data plans give you unlimited data, messages and calls to any mobile, anytime while on the Sprint Network. That's access to over 250 million U.S. mobile phones nationwide. Take advantage of unlimited Nationwide messaging, Web surfing, and nights and weekends with nights starting at 7 p.m. Learn more about how our \$69.99 plan compares to the competition.

This plan includes

Any Mobile, Anytime: Unlimited domestic calls from the Sprint network to and from ANY U.S. mobile phone regardless of carrier. Any network, any time.

Unlimited data: Web surfing, email, BlackBerry Internet Services (BIS), GPS Navigation, Music Premier, TV Premier, NFL Mobile Live, NASCAR Sprint Cup Mobile™

Unlimited Direct Connect: Direct Connect and Group Connect (for capable phones)

Unlimited messaging: Text, pictures and video

Talk: Night calling and weekends starting at 7 p.m., nationwide long distance and no roaming charges

More about what's included in this plan

Anytime Minutes

Monthly Price

Additional Anytime Minutes

450

\$69.99

45¢/min

Select

900

\$89.99

40¢/min

Select

Everything Messaging

Communicate without saying a word; with this plan, you can text, share and send your heart out.

This plan includes

Unlimited Direct Connect: Direct Connect and Group Connect (for capable phones)

Unlimited messaging: Text, pictures and video

Talk: Unlimited Sprint mobile to mobile, night calling and weekends starting at 7 p.m., nationwide long distance and no roaming charges

[More about what's included in this plan](#)

Anytime Minutes	Monthly Price	Additional Anytime Minutes	
450	\$49.99	45¢/min	Select
900	\$69.99	40¢/min	Select

Talk

Let your voice be heard with these voice-only plans.

This plan includes

Talk: Unlimited mobile to mobile, night calling and weekends starting at 7 p.m., nationwide long distance and no roaming charges

Unlimited Direct Connect: Direct Connect and Group Connect (for capable phones)

[More about what's included in this plan](#)

Additional plan options:

Unlimited Nights & Weekends

- Unlimited Nights & Weekends starting at 7pm! - \$0.00
- Nights and Weekends starting at 6PM - \$5.00

Anytime Minutes	Monthly Price	Additional Anytime Minutes	
450	\$39.99	45¢/min	Select
900	\$59.99	40¢/min	Select

Basic

Get back to the basics with this plan ideal for the occasional caller.

This plan includes

Talk: Night calling and weekends starting at 9 p.m., nationwide long distance and no roaming charges

Unlimited Direct Connect: Direct Connect and Group Connect (for capable phones)

[More about what's included in this plan](#)

Additional plan options:

Unlimited Nights & Weekends

- Nights and Weekends - Starting at 9pm - \$0.00
- Nights and Weekends - Starting at 7pm - \$5.00
- Nights and Weekends - Starting at 6pm - \$10.00

Anytime Minutes	Monthly Price	Additional Anytime Minutes	
200	\$29.99	45¢/min	Select

Features included in all voice plans.

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Get unlimited local and long-distance calling for one low rate for only \$19.99 a month for 6 months!

- Easy to switch—keep your home phone number.
- Unlimited local and long-distance nationwide calling to the U.S., Canada and Puerto Rico.
- Rated #1 in call clarity thanks to our enhanced fiber-optic network.*
- Visual voice mail that lets you see who called so you can listen to the most important messages first.
- 12 popular calling features including Caller ID, Call Waiting, and more.
- Low international calling rates.

*Incorporates fiber and coax.

Offer limited to residential customers satisfying applicable eligibility criteria.

Post-promotional price starts at \$39.95 and varies depending on the Comcast services you subscribe to.

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Special Comcast.com Price!

\$19.99

for the first 6 months
\$39.95 per month thereafter

ADD TO MY CART →

Comcast Unlimited® - Special Offer

Get unlimited local and long-distance calling for one low rate for only \$29.99 a month for 12 months!

- Easy to switch—keep your home phone number.
- Unlimited local and long-distance nationwide calling to the U.S., Canada and Puerto Rico.
- Rated #1 in call clarity thanks to our enhanced fiber-optic network.*
- Visual voice mail that lets you see who called so you can listen to the most important messages first.
- 12 popular calling features including Caller ID, Call Waiting, and more.
- Low international calling rates.

*Incorporates fiber and coax.

Offer limited to residential customers satisfying applicable eligibility criteria.

Post-promotional price starts at \$39.95 and varies depending on the Comcast services you subscribe to.

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Special Comcast.com Price!

\$29.99

for the first 12 months
\$39.95 per month thereafter

ADD TO MY CART →

Local with More®

In-state and out-of-state nationwide long-distance for just 5 cents a minute.

- Easy to switch—keep your home phone number.
- Unlimited local calling.
- Rated #1 in call clarity* thanks to our enhanced fiber-optic network.*
- 12 popular calling features including Caller ID, Call Waiting, and more.
- *Based upon an independent study performed by Keynote dated November, 2008, Wave 6 Study.
- *Incorporates fiber and coax.
- This starting price is for customers that currently subscribe to Comcast Cable and/or Comcast High-Speed Internet.

*Incorporates fiber and coax.

View International Rates
Terms and Conditions
Learn More

\$24.95

 per month

ADD TO MY CART →

Comcast Unlimited®

Unlimited local and Nationwide long-distance calling for one low rate.
Easy to switch—keep your home phone number.
Unlimited local and long-distance calling to the U.S., Canada and Puerto Rico.

Exhibit DFB-4

Products

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Rico.

Rated #1 in call clarity* thanks to our enhanced fiber-optic network.*

Visual voice mail that lets you see who called so you can listen to the most important messages first.

12 popular calling features including Caller ID, Call Waiting, and more.

Low international calling rates.

*Based upon an independent study performed by Keynote dated November, 2008, Wave 6 Study.

*Incorporates fiber and coax.

This starting price is for customers that currently subscribe to Comcast Cable and Comcast High-Speed Internet.

\$39.95 per month

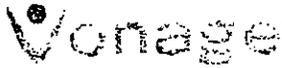
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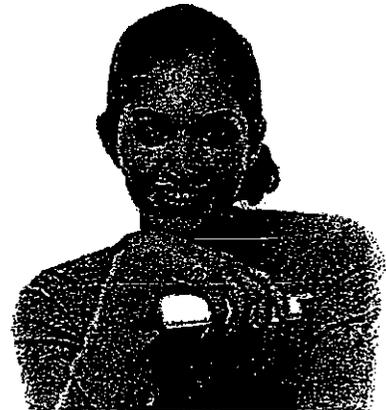
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Free activation, Free priority shipping and a Vonage phone adapter.
with one year agreement†

- Get unlimited local and long distance calling across the U.S. and Puerto Rico
- Free unlimited international calling to over 80 countries including India, Mexico, and Canada [See country list](#)
- Keep your existing number*
- 25 amazing features like:
 - VONAGE VISUAL VOICEMAIL®**
 - › Vonage converts^ all of your voicemails for FREE and sends them to you via text or email
 - › Never have to listen to a voicemail again - unless you want to
 - ANONYMOUS CALL BLOCK**
 - › Block all unknown or restricted numbers so you can avoid annoying calls



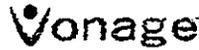
Get a FREE Month of Service for Every Friend You Refer!‡
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High-speed Internet required. † Limited time offer, valid for new lines only. Rates exclude Internet service, fees and taxes. Device may be refurbished. A disconnection fee of \$39.99 will apply for cancellation after the 30-day Money Back Guarantee period and before 1 year. [See details](#). Your money back guarantee period and billing start on the date of your order. If you cancel within your money back guarantee period, you must return the device. If you cancel after the money back guarantee period and within 1 year of your order date, you will be charged a rebate recovery fee equal to the amount of the rebate initially given to you for the equipment. Unlimited calling subject to normal residential use. Vonage 911 operates differently than traditional 911. E911 not available everywhere. For details [click here](#). Alarms, TTY and other systems may not be compatible. ^ Supports English Only. * Where available. Transfer may take up to 10 days. ‡ The Referrer will not be charged for the monthly service fee of their plan but other charges will apply. See plan for details. If either Referrer or Referee cancels before 90 days from the date the Referee subscribes to Vonage service, this will result in the loss of and/or chargeback of associated credits to the payment method on file.
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500 Minutes
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Enter the international number you would like to check.

(country code + area/city code + number)

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Vonage World: Vonage World.FACs

ONLY \$14.99 per month (plus \$35.99 one-time activation fee)

- Unlimited local and long distance in the U.S. and Puerto Rico
- FREE unlimited landline calls to all cities and locations in more than 60 other countries*, including India, Mexico and Canada
- FREE unlimited **in-network** calling anywhere around the world
- 25+ amazing calling features including the readable voicemail Caller ID, Call Waiting and Anonymous Call Block.
- Switch to Vonage and keep your existing phone numbers

30-DAY MONEY BACK GUARANTEE

No set-up, shipping or equipment costs - a \$125 value

Added benefits:

- 24/7 access to your billing information using your online account.
- Get quick access to local emergency services with Vonage's 911 Dialing feature
- Telecommute? Travel a lot? The Vonage phone adapter is small and totally portable — you can use it anywhere there's a high-speed Internet connection.

Requirements:

- You must have a high-speed Internet connection (cable or DSL)
- You need a U.S. or Puerto Rico shipping address (sorry, no P.O. boxes)
- Once you sign up, we will ship your startup package within five business days.

***Money Back Guarantee**
Vonage is so confident that you will love all the features and savings, that we offer you a 30-day Money Back Guarantee.

**All calls to landline phones included. Calls to cell phones may be included depending on destination. Subject to change. Excludes certain call types such as calls to non-geographic and premium numbers. See details. \$\$\$upports English only. Unlimited calling subject to normal residential use.

Keep Your Existing Number *

Most phone numbers can be transferred to Vonage. Can yours?

Available Area Codes

Calculate Start Up Costs

Calculate Savings

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* LIMITED TIME OFFER, VALID FOR NEW LINES ONLY. RATES EXCLUDE HIGH SPEED INTERNET SERVICE, SURCHARGES, FEES AND TAXES. FOR CANCELLATION AFTER THE 30-DAY MONEY BACK GUARANTEE PERIOD AND WITHIN 1 YEAR FROM ORDER PAYMENT DATE, A DISCONNECTION FEE OF \$39.99 AND A REBATE RECOVERY FEE EQUAL TO THE AMOUNT OF THE REBATE INITIALLY GIVEN TO YOU FOR THE DEVICE WILL APPLY. YOUR MONEY BACK GUARANTEE PERIOD AND BILLING START ON THE DATE OF YOUR ORDER. IF YOU CANCEL WITHIN THE MONEY BACK GUARANTEE PERIOD, YOU MUST PROMPTLY RETURN THE DEVICE OR INCUR A DEVICE RECOVERY FEE. SEE DETAILS. * Where available. The number transfer process takes approximately 10 business days to a the time you confirm your transfer request. Unlimited calling subject to normal residential use. Alarm, TTY and other services may not be compatible. Vonage 911 service operates differently than traditional 911. See [www.vonage.com/911](#) for details. The Referrer will not be charged for the monthly service fee of their plan but other charges will apply. See plan for details. If either Referrer or Referee cancels before 90 days from the date the Referee subscribes to Vonage service, this will result in the loss of entire chargeback of associated credits to the payment method on file © 2010 Vonage Marketing LLC. All Rights Reserved

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Unlimited minutes To 60+ countries

Vonage Pro™
Classic Plan
includes PC calling

Basic 500
500 Minutes
at a low price

\$34.99
/month

Order Now
with one-year agreement

Vonage Pro™ Plan:
For people on the go who need more communication options, Vonage Pro offers:

- Unlimited local and long distance in the U.S., Canada, and Puerto Rico at any time
- FREE unlimited calling to landlines in Italy, France, Spain, UK, and Ireland*
- 25+ amazing calling features included like Call Waiting, Voicemail, and Caller ID.
- Includes Vonage Companion, which allows you to make and receive calls from any computer with a high-speed internet connection
- 25 Visual Voicemails included each month. Your voicemail is transcribed to text and sent to up to 5 live phone numbers and/or email addresses of your choosing†
- 25 free Enhanced 911 Directory Assistance calls per month included.
- Includes International Rates as low as 1 cent per minute

With no set-up fees or equipment costs here's just how much you can save:

Activation Fee	\$0.00 - A \$29.99 Value
Priority Shipping and Handling	\$0.00 - A \$14.99 Value
Vonage Phone Adapter	\$0.00 - \$16.99 Original Price

Sign up today and pay only **\$34.99**/mo!

with one-year agreement* activation may be rebated

- Added benefits**
- Switch to Vonage and keep your existing phone number
 - Choose any area code from across the US
 - 24/7 access to your billing information using your online account
 - Quick access to local emergency services with Vonage's 911 Dialing Feature

- Requirements**
- You must have a high-speed internet connection (cable or DSL)
 - You need a U.S. or Puerto Rico shipping address (sorry, no P.O. boxes)
 - Once you sign up, we will ship your startup package within five business days. To start, simply connect your telephone, using the Vonage phone adapter, to your high-speed internet connection.

Money Back Guarantee
Vonage is so convinced that you will love all the features and savings, that we offer you a 30-day Money Back Guarantee.



Keep Your Existing Number*

Most phone number can be transferred to Vonage. Can yours?



- Available Area Codes
- Calculate Start Up Costs
- Calculate Savings

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* RATES EXCLUDE HIGH SPEED INTERNET SERVICE, SURCHARGES, FEES AND TAXES. FOR CANCELLATION AFTER THE 30-DAY MONEY BACK GUARANTEE PERIOD AND WITHIN 1 YEAR FROM YOUR ORDER PAYMENT DATE, A DISCONNECTION FEE OF \$39.99 AND A REBATE RECOVERY FEE EQUAL TO THE AMOUNT OF THE REBATE INITIALLY GIVEN TO YOU FOR THE DEVICE WILL APPLY. YOUR MONEY BACK GUARANTEE PERIOD AND BILLING START ON THE DATE OF YOUR ORDER. IF YOU CANCEL WITHIN THE MONEY BACK GUARANTEE PERIOD, YOU MUST PROMPTLY RETURN THE DEVICE OR INCUR A DEVICE RECOVERY FEE. SEE DETAILS. † Where available. The number transfer process takes approximately 10 business days from the time you order to your transfer request. Unlisted calling subject to normal residential use. Alerts, TTY and other systems may not be compatible. Vonage 911 service operates differently than traditional 911. See www.vonage.com/911 for details. ‡ Support is English only. † The Referrer will not be charged for the monthly service fee of this plan but other charges will apply. See plan for details. ‡ either Referrer or Referee ceases before 90 days from the date the Referee

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Unlimited minutes To 80+ countries

Vonage ProSM
Classic Plan
includes PG calling

Basic 500
500 Minutes
at a low price

\$17⁹⁹
month!

Residential Basic 500:

- 500 minutes of outbound local and long distance calling to anywhere in the U.S., Canada, and Puerto Rico
- Only 3.9¢ for each additional minute
- Unlimited incoming minutes
- Unlimited Vonage-to-Vonage calls
- 25+ amazing calling features included like Call Waiting, Voicemail, and Caller ID.
- Switch to Vonage and keep your existing phone numbers
- Includes International Rates as low as 1 cent per minute

Order Now!
with one-year agreement

Added benefits

- Switch to Vonage and keep your existing phone number
- Choose any area code from across the US
- 24/7 access to your billing information using your online account
- Quick access to local emergency services with Vonage's 911 Calling feature
- Telecommute? Travel a lot? The Vonage phone adapter is small and totally portable — you can use it anywhere there's a high-speed internet connection

Requirements

- You must have a high-speed internet connection (cable or DSL)
- You need a U.S. or Puerto Rico shipping address (sorry, no P.O. boxes)
- Once you sign up, we will ship your startup package within five business days. To start, simply connect your telephone, using the Vonage phone adapter, to your high-speed internet connection.

Money Back Guarantee

Vonage is so convinced that you will love all the features and savings, that we offer you a 30-day Money Back Guarantee.

EARN A FREE MONTH OF SERVICE FOR EVERY FRIEND YOU REFER*

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Keep Your Existing Number*

Most phone number can be transferred to Vonage. Can yours?



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RATES EXCLUDE HIGH SPEED INTERNET SERVICE, SURCHARGES, FEES AND TAXES. FOR CANCELLATION AFTER THE 30-DAY MONEY BACK GUARANTEE PERIOD AND WITHIN 1 YEAR FROM YOUR ORDER PAYMENT DATE, A DISCONNECTION FEE OF \$39.99 AND A REBATE RECOVERY FEE EQUAL TO THE AMOUNT OF THE REBATE INITIALLY GIVEN TO YOU FOR THE DEVICE WILL APPLY. YOUR MONEY BACK GUARANTEE PERIOD AND BILLING START ON THE DATE OF YOUR ORDER. IF YOU CANCEL WITHIN THE MONEY BACK GUARANTEE PERIOD, YOU MUST PROMPTLY RETURN THE DEVICE OR INCUR A DEVICE RECOVERY FEE. SEE DETAILS. * Where available. The number transfer process takes approximately 10 business days from the time you confirm your transfer request. Alerts, IVR and user systems may not be compatible. Vonage 911 service operates differently than traditional 911. See [www.vonage.com/911](#) for details. † The Referrer will not be charged for the monthly service fee of their plan but other charges will apply. See plan for details. If either Referrer or Referee cancels before 30 days from the date the Referee subscribes to Vonage service, this will result in the loss of order chargeback of associated credits in the payment method. © 2010 Vonage Marketing LLC. All Rights Reserved.

Exhibit DFB-4

Armstrong Telecommunications, Inc.

PA PUC Tariff No. 1
Section 2
Original Sheet 37

C. LOCAL EXCHANGE SERVICE OFFERINGS AND RATES (cont'd)

2. Residence Rates - Monthly Recurring

Local Service with Optional Calling Services Package	\$18.00
Local Service with Unlimited LATA Calling Package	\$22.00
Local Service with Unlimited LATA and Optional Calling Services Package	\$25.00
Local Service	\$15.00

3. Business Service Offerings

Local Service - Provides the Customer with unlimited calling to those exchanges identified in the Local Exchange Service portion of this tariff.

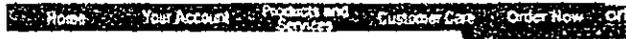
4. Business Rates - Monthly Recurring

Less than 20 lines	\$18.00
20 lines or over	
- 1 year service agreement	\$16.20
- 3 year service agreement	\$14.50
- 5 year service agreement	\$13.00

Issued: December 12, 2001

Effective December 13, 2001

Dru A. Sedwick
ARMSTRONG TELECOMMUNICATIONS, INC.
One Armstrong Place
Butler, PA 16001



You Are Here: Home > Digital Phone Pricing
Digital Phone Pricing

Includes unlimited local and long distance calls within the continental United States, Alaska, Hawaii, Puerto Rico, Guam & US Virgin Islands

If You Have:	Add Digital Phone For:
➤ Basic+ Cable AND High Speed Internet	\$34.95/month
➤ Basic+ Cable OR High Speed Internet	\$39.95/month
➤ Digital Phone Only	\$49.95/month

Calling Features:	
Voice Mail	Included
Call Waiting	Included
Enhanced Caller ID	Included
Caller ID Blocking	Included
Call Return	Included
Call Forwarding	Included
Three Way Calling	Included
Speed Dialing	Included
E911	Included

International Calling ([Click here for rates](#))
 An additional per minute surcharge applies when calling an international mobile or cell phone.

International Calling Codes ([Click here for codes](#))

Per-Call Charges	
Directory Assistance per call(local)	\$1.23+tax

Money Back Guarantee

We are so confident about the quality of Blue Ridge Digital Phone that we're offering a 30-day, money-back, satisfaction guarantee. If you are dissatisfied with your Blue Ridge Digital Phone Service for any reason, you will receive a refund if you cancel the Service within 30 days of installation.*

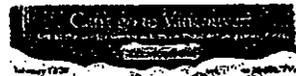
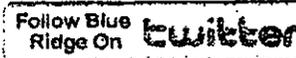


* Only fees paid for standard installation, equipment (if returned) and 30 days of service will be refunded.



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- [MYBRCTV.com](#)



9 TO 1 OFFICE PARTY WITH THE DOCTOR
 DIGITAL CABLE CHANNEL 113



Change Your Location: Select

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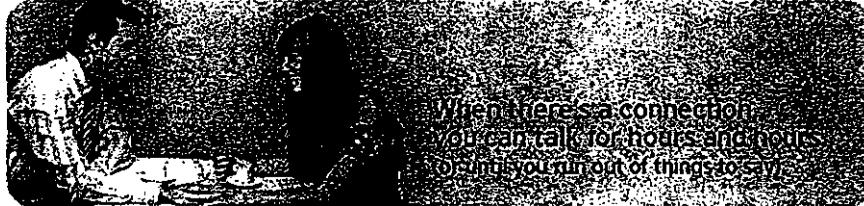


FOR HOME

PHONE IN LEHIGH VALLEY Plans & Pricing

Can I get service at my home?
Check to see if RCN is available to you.

- Plans & Pricing
- Calling Features
- International Calling



Now it costs even less to stay connected. With our unlimited phone plans, you can make as many local or long-distance calls as you want. Call anytime and talk for as long as you like, for a flat monthly rate.

Unlimited Nationwide Calling

- Clear calls on our reliable digital network
- Unlimited phone calls nationwide
- Includes five free calling features
- No per-minute long-distance rates
- Call anywhere in the United States (including Alaska, Hawaii, Puerto Rico, U.S. Virgin Islands and Canada)
- Low international calling rates

\$29.99/mo
12-month contract
(reg. \$59.99)

as low as \$89.99/mo.

Great Add-Ons | Included Features

Service offerings are contingent upon RCN verification that the specific address covered by the service request is an RCN serviceable location. Prices do not include taxes, franchise fees or other surcharges. Services and pricing are subject to change. All phone used within rcn.com are intellectual properties of their respective owners. Services are subject to terms and conditions of RCN's subscriber agreements, on-line policies, and other applicable terms and conditions. Other restrictions may apply.

Not all services are available in all areas. Calls to international countries will be billed on a per-minute basis. RCN does not provide Caller ID equipment! Additional charges apply to new or moved phone jacks and may apply to additional cable jacks as well as custom or non-standard installation work. Other restrictions may apply. Customers who opt out of services may be subject to a non-refundable \$5.00 service downgrade fee.

RCN's current monthly service charge ranges from \$65 to \$76, depending on area and services elected. Customer has no obligation to opt into contract price, but in that event, customer agrees to be bound by the terms and conditions of the contract, including, without limitation, the obligation to pay an early termination fee if services are cancelled prior to the expiration of the contract term. Installation fees may apply.

The availability of services, pricing and offerings displayed on this site are for residential new RCN customers only. Commercial and business pricing and service offerings differ.

High-Speed Internet
Services & Pricing
Bundles
Cable vs. DSL
Home Networking

Digital Cable TV
Services & Pricing
Bundles
Channel Lineups
ON DEMAND Movies

Phone
Services & Pricing
Bundles
Phone Extras
International Calling

Come Home to RCN!

When you come home to RCN, you're connecting to a comprehensive digital entertainment platform that is committed to bringing customers the best digital cable TV, high-speed internet and phone bundles to homes in and around Boston, Chicago, New York City, the Lehigh Valley, Philadelphia and Washington, D.C. over a reliable network of fiber-optic cables.

In the Lehigh Valley, we provide service to the Allentown-Bethlehem-Easton region of Pennsylvania including many surrounding boroughs. Read more

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RESPONSE OF AT&T COMMUNICATIONS OF PENNSYLVANIA, LLC., TCG NEW JERSEY, INC. AND TCG PITTSBURGH TO CENTURYLINK'S SET IV DATA REQUESTS DATED MARCH 18, 2010, DOCKET NOS. C-2009-2098380 ET AL. AND I-00040105

CTL-ATT 4-10: Reference pages 20 (line 10) to page 21 (line10) regarding the benchmark rates now proposed by AT&T. Provide all documents, studies and analyses undertaken by or on behalf of AT&T determining that CenturyLink under these proposals can both recover its costs and price competitively in its service territories.

Response: See response to CTL-ATT 2-5.

CTL-Sprint 5-4 Reference Rebuttal Testimony at page 33, line 1 (Confidential percentage regarding Sprint's alleged service, both direct and through roaming agreements, of "all Pennsylvanians."). Provide a detailed map of the locations of where Sprint "directly" provides service to customers (exclude roaming areas).

Objection: Sprint objects to the question on the grounds that the question is unduly burdensome, overbroad, and not narrowly tailored, and would cause unreasonable annoyance, oppression, burden and expense. Sprint objects to undertaking the special study that would be required to provide a response to this question. Sprint also objects to the question on the grounds that it seeks information that is subject to the work product doctrine, the attorney-client privilege, or other privilege. Subject to and without waiving the foregoing objections, Sprint will provide a response to CenturyLink's question.

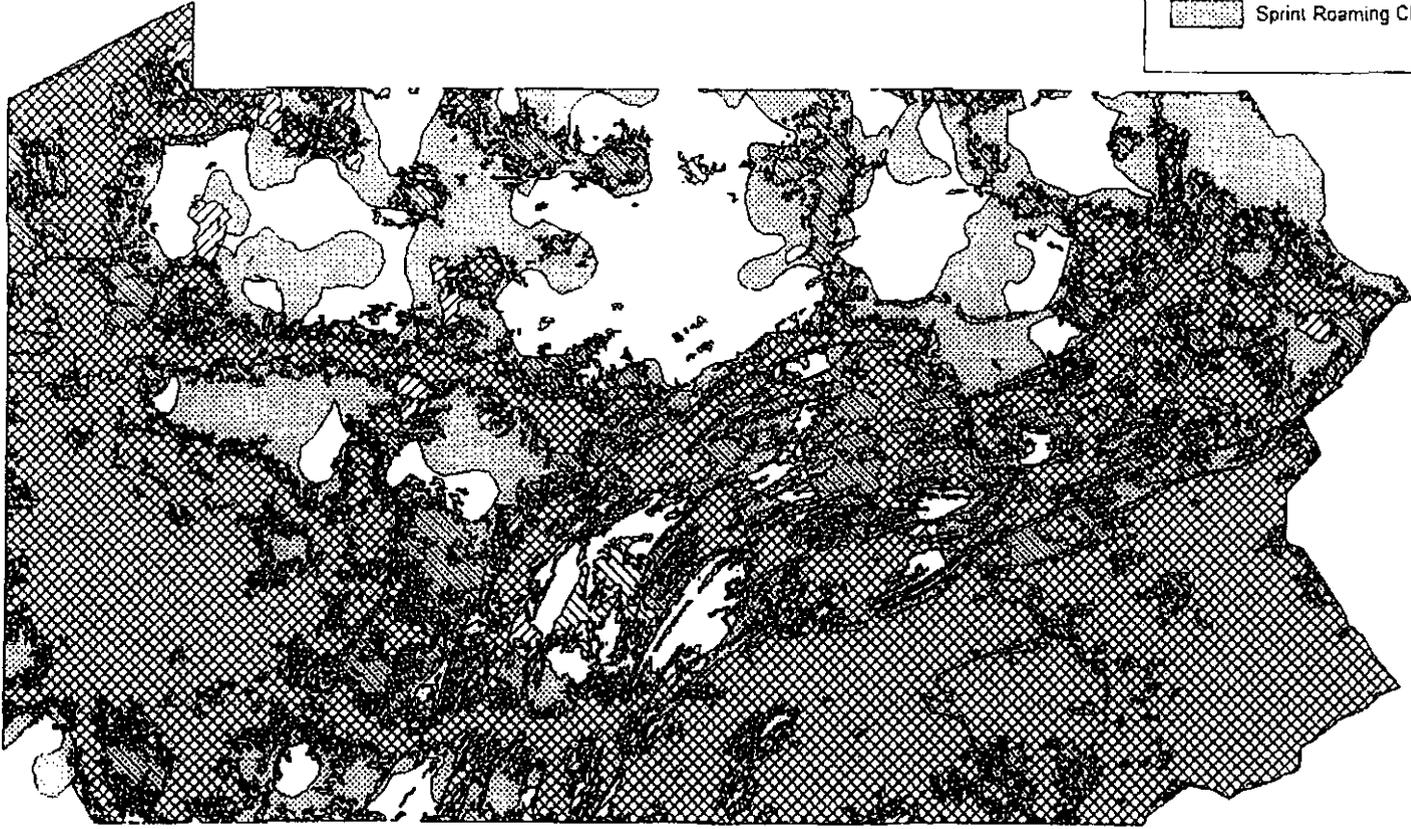
Response:

Sponsored By: James A. Appleby

See attached map.

Legend

-  Sprint IDEN Coverage
-  Sprint CDMA Coverage
-  Sprint Roaming CDMA Coverage

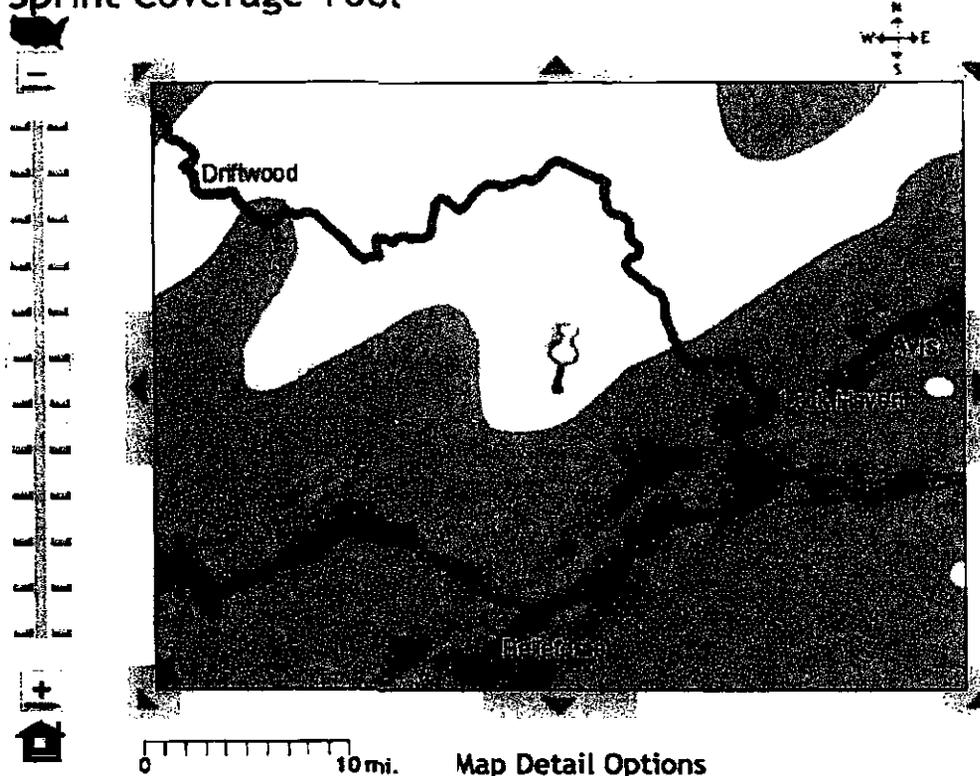




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Sprint Coverage Tool



0 10 mi.
Coverage updated on: 3/30/10

Map Detail Options

- City names Major roads
- Recent towers Future towers

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Map a location

Primary Location
BEECH CREEK, PA 16822

No Coverage

Map new locations

Sprint also offers international roaming coverage



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This tool provides high-level estimates of our wireless coverage. Coverage is not available everywhere and varies based on a number of factors. > [Learn more](#)

You may have different coverage if you have:
-Single- or dual-band older phone models .
-A plan that does not include roaming (view coverage) .



5

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Sprint Coverage Tool

Map Detail Options

Coverage updated on: 3/30/10

City names Major roads
 Recent towers Future towers

Map a location

Primary Location
EAST WATERFORD, PA

No Coverage

Map new locations

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▶ Nextel Di

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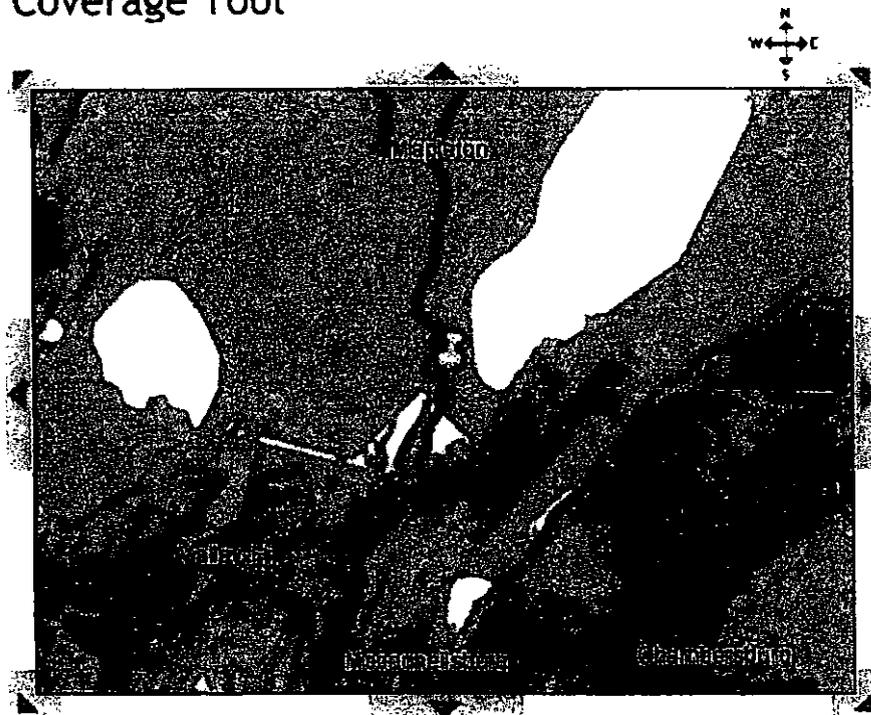
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Sprint Coverage Tool



0 10 mi.

Coverage updated on: 3/30/10

Map Detail Options

- City names Major roads
- Recent towers Future towers

[Check out our latest phones](#) [Shop Online](#)

Map a location

Primary Location
SHADE GAP, PA 17

Roaming

[Map new locations](#)

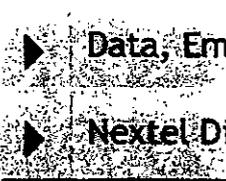
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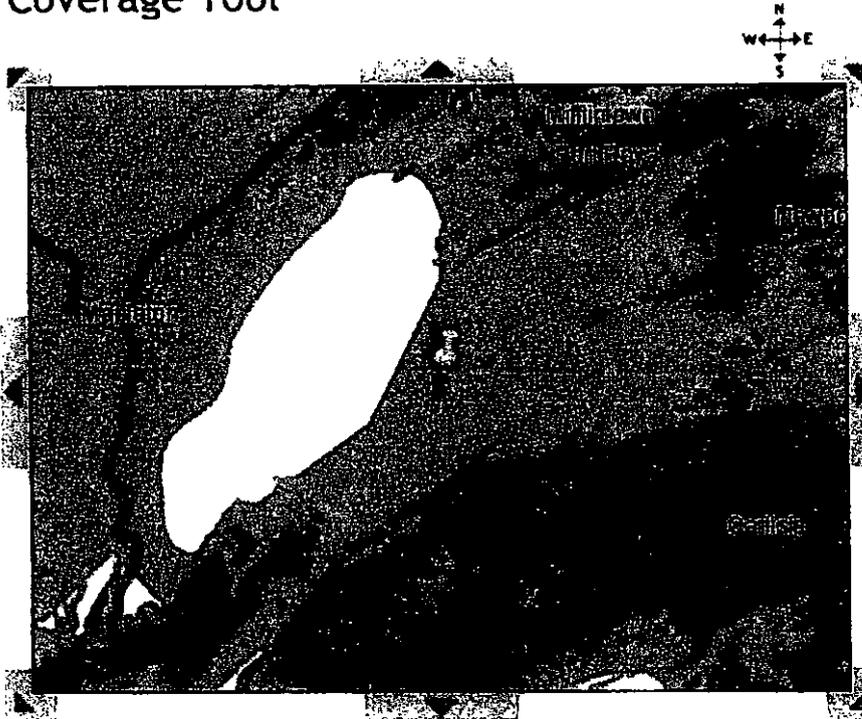
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0 10 mi.

Coverage updated on: 3/30/10

Map Detail Options

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- Recent towers Future towers

Map a location

Primary Location
BLAIN, PA 17006



Map new locations

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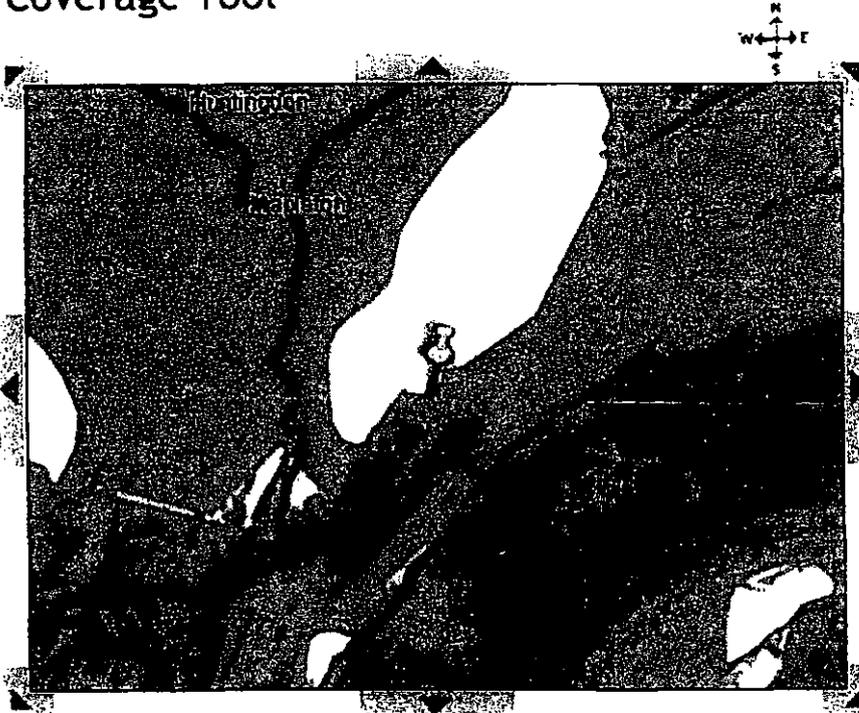
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-A plan that does not include roaming (view coverage) .



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Coverage updated on: 3/30/10

Map Detail Options

- City names Major roads
- Recent towers Future towers

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Map a location

Primary Location
DOYLESBURG, PA



Map new locations

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You may have different coverage if you have:
-Single- or dual-band older phone models .
-A plan that does not include roaming (view coverage) .



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Sprint Coverage Tool

Map Detail Options

Coverage updated on: 3/30/10

City names Major roads

Recent towers Future towers

Map a location

Primary Location
CLEARVILLE, PA 15535



Map new locations

Sprint also offers international roaming coverage



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This tool provides high-level estimates of our wireless coverage. Coverage is not available everywhere and varies based on a number of factors. > Learn more

You may have different coverage if you have:
-Single- or dual-band older phone models.
-A plan that does not include roaming (view coverage).

CTL-Sprint 4-39 Provide a complete, current copy of all Sprint cable telephony partner agreements effective in Pennsylvania.

Objection: Sprint objects to the question on the grounds that the question is unduly burdensome, overbroad, and not narrowly tailored, and would cause unreasonable annoyance, oppression, burden and expense. Sprint objects to undertaking the special study that would be required to provide a response to this question. Sprint also objects to the question on the grounds that it seeks information that is subject to the work product doctrine, the attorney-client privilege, or other privilege. Sprint objects that some of the information requested, and the manner in which it is requested to be produced, would reveal proprietary information, confidential business information, and trade secrets regarding Sprint's business interests and operations. Sprint objects to the question on the grounds that it infringes upon the confidentiality interests of Sprint's wholesale customer(s) that are not parties to this proceeding. Sprint objects to the question on the grounds that the questions seek highly competitively sensitive information and business secrets the release of which could harm the level and integrity of competition in Pennsylvania. Sprint objects to the question on the grounds CenturyLink's tactic of seeking confidential business and contractual information regarding Sprint's wholesale business is a tactic CenturyLink has unsuccessfully employed in access reform litigation across the country, and which is seeks information that is not probative to the appropriate level of RLEC intrastate switched access. Sprint Objects on the grounds that the Interrogatory seeks information previously provided by Sprint in prior discovery responses. The information sought is not relevant to the subject matter of the matter at bar and will not lead to the discovery of admissible evidence. Sprint will not provide a response to CenturyLink's question.

Response:

Sponsored By: James A. Appleby

See objection above.

CTL-Sprint 4-40 Relative to Sprint's cable telephony partner agreements effective in Pennsylvania, identify if the cable telephony partner agreements expire and provide the dates and terms/provisions.

Objection: Sprint objects to the question on the grounds that the question is unduly burdensome, overbroad, and not narrowly tailored, and would cause unreasonable annoyance, oppression, burden and expense. Sprint objects to undertaking the special study that would be required to provide a response to this question. Sprint also objects to the question on the grounds that it seeks information that is subject to the work product doctrine, the attorney-client privilege, or other privilege. Sprint objects that some of the information requested, and the manner in which it is requested to be produced, would reveal proprietary information, confidential business information, and trade secrets regarding Sprint's business interests and operations. Sprint objects to the question on the grounds that it infringes upon the confidentiality interests of Sprint's wholesale customer(s) that are not parties to this proceeding. Sprint objects to the question on the grounds that the questions seek highly competitively sensitive information and business secrets the release of which could harm the level and integrity of competition in Pennsylvania. Sprint objects to the question on the grounds CenturyLink's tactic of seeking confidential business and contractual information regarding Sprint's wholesale business is a tactic CenturyLink has unsuccessfully employed in access reform litigation across the country, and which is seeks information that is not probative to the appropriate level of RLEC intrastate switched access. Sprint Objects on the grounds that the Interrogatory seeks information previously provided by Sprint in prior discovery responses, or on the grounds that CenturyLink previously requested the same information in prior discovery requests that Sprint objected to, and for which no Motion to Compel was filed. The information sought is not relevant to the subject matter of the matter at bar and will not lead to the discovery of admissible evidence. Sprint will not provide a response to CenturyLink's question.

Response:

Sponsored By: James A. Appleby

See objection above.

CTL-Sprint 4-41 Relative to Sprint's cable telephony partner agreements effective in Pennsylvania, will the agreement remain effective as written if intrastate switched access rates are reduced in this proceeding?

Objection: Sprint objects to the question on the grounds that the question is unduly burdensome, overbroad, and not narrowly tailored, and would cause unreasonable annoyance, oppression, burden and expense. Sprint objects to undertaking the special study that would be required to provide a response to this question. Sprint also objects to the question on the grounds that it seeks information that is subject to the work product doctrine, the attorney-client privilege, or other privilege. Sprint objects that some of the information requested, and the manner in which it is requested to be produced, would reveal proprietary information, confidential business information, and trade secrets regarding Sprint's business interests and operations. Sprint objects to the question on the grounds that it infringes upon the confidentiality interests of Sprint's wholesale customer(s) that are not parties to this proceeding. Sprint objects to the question on the grounds that the questions seek highly competitively sensitive information and business secrets the release of which could harm the level and integrity of competition in Pennsylvania. Sprint objects to the question on the grounds CenturyLink's tactic of seeking confidential business and contractual information regarding Sprint's wholesale business is a tactic CenturyLink has unsuccessfully employed in access reform litigation across the country, and which is seeks information that is not probative to the appropriate level of RLEC intrastate switched access. Sprint Objects on the grounds that the Interrogatory seeks information previously provided by Sprint in prior discovery responses, or on the grounds that CenturyLink previously requested the same information in prior discovery requests that Sprint objected to, and for which no Motion to Compel was filed. The information sought is not relevant to the subject matter of the matter at bar and will not lead to the discovery of admissible evidence. Sprint will not provide a response to CenturyLink's question.

Response:

Sponsored By: James A. Appleby

See objection above.

CTL-Sprint 4-42 Relative to Sprint's cable telephony partner agreements effective in Pennsylvania, identify what Sprint believes are the change of law provisions.

Objection: Sprint objects to the question on the grounds that the question is unduly burdensome, overbroad, and not narrowly tailored, and would cause unreasonable annoyance, oppression, burden and expense. Sprint objects to undertaking the special study that would be required to provide a response to this question. Sprint also objects to the question on the grounds that it seeks information that is subject to the work product doctrine, the attorney-client privilege, or other privilege. Sprint objects that some of the information requested, and the manner in which it is requested to be produced, would reveal proprietary information, confidential business information, and trade secrets regarding Sprint's business interests and operations. Sprint objects to the question on the grounds that it infringes upon the confidentiality interests of Sprint's wholesale customer(s) that are not parties to this proceeding. Sprint objects to the question on the grounds that the questions seek highly competitively sensitive information and business secrets the release of which could harm the level and integrity of competition in Pennsylvania. Sprint objects to the question on the grounds CenturyLink's tactic of seeking confidential business and contractual information regarding Sprint's wholesale business is a tactic CenturyLink has unsuccessfully employed in access reform litigation across the country, and which is seeks information that is not probative to the appropriate level of RLEC intrastate switched access. Sprint Objects on the grounds that the Interrogatory seeks information previously provided by Sprint in prior discovery responses, or on the grounds that CenturyLink previously requested the same information in prior discovery requests that Sprint objected to, and for which no Motion to Compel was filed. The information sought is not relevant to the subject matter of the matter at bar and will not lead to the discovery of admissible evidence. Sprint will not provide a response to CenturyLink's question.

Response:

Sponsored By: James A. Appleby

See objection above.

CTL-Sprint 5-1 Reference page 3 of Mr. Appleby's Rebuttal Testimony lines 10 and 11 ("RLEC's ubiquitous network obligations are not burdensome and actually provide many advantages and opportunities."). (a) Identify in full each and every "network obligation;" (b) Identify in full each and every specific advantage alleged by Mr. Appleby; and (c) Identify in full each and every opportunity claimed. Provide all documents.

Objection: Sprint objects to the question on the grounds that the question is unduly burdensome, overbroad, and not narrowly tailored, and would cause unreasonable annoyance, oppression, burden and expense. Sprint objects to undertaking the special study that would be required to provide a response to this question. Sprint also objects to the question on the grounds that it seeks information that is subject to the work product doctrine, the attorney-client privilege, or other privilege. Subject to and without waiving the foregoing objections, Sprint will provide a response to CenturyLink's question.

Response:

Sponsored By: James A. Appleby

Sprint does not possess any further information beyond what has been provided with the Rebuttal Testimony on pages 54-60.

CTL-Sprint 5-2 Reference page 3 of Mr. Appleby's Rebuttal Testimony lines 10 and 11 ("RLEC's ubiquitous network obligations are not burdensome and actually provide many advantages and opportunities."). Provide all documents, studies, analyses and calculations in support of the statement that these obligations are "are not burdensome."

Objection: Sprint objects to the question on the grounds that the question is unduly burdensome, overbroad, and not narrowly tailored, and would cause unreasonable annoyance, oppression, burden and expense. Sprint objects to undertaking the special study that would be required to provide a response to this question. Sprint also objects to the question on the grounds that it seeks information that is subject to the work product doctrine, the attorney-client privilege, or other privilege. Subject to and without waiving the foregoing objections, Sprint will provide a response to CenturyLink's question.

Response:

Sponsored By: James A. Appleby

See response to CTL-Sprint 5-1.

RESPONSE OF AT&T COMMUNICATIONS OF PENNSYLVANIA, LLC., TCG NEW JERSEY, INC. AND TCG PITTSBURGH TO INTERROGATORIES OF CENTURYLINK DATED DECEMBER 14, 2009, Docket Nos.: I-00040105 and C-2009-2098380 et al.

CTL-ATT 2-31 Since the *Global Order*, identify by year, by incumbent local exchange carrier, by AT&T plan, and by rate the flow through, if any, of intrastate switched access reductions undertaken by AT&T in Pennsylvania. Provide any and all documents submitted to the Pennsylvania Public Utility Commission. Provide any and all documents demonstrating that AT&T flowed through in its rates any intrastate access reductions.

Response: SPONSORED BY E. CHRISTOPHER NURSE AND DR. OLA OYEFUSI

See AT&T's response to CTL-ATT 2-30. AT&T is still in the process of investigating this request given the passage of so many years since the *Global Order*.

Supplemental Response Dated January 20, 2010:

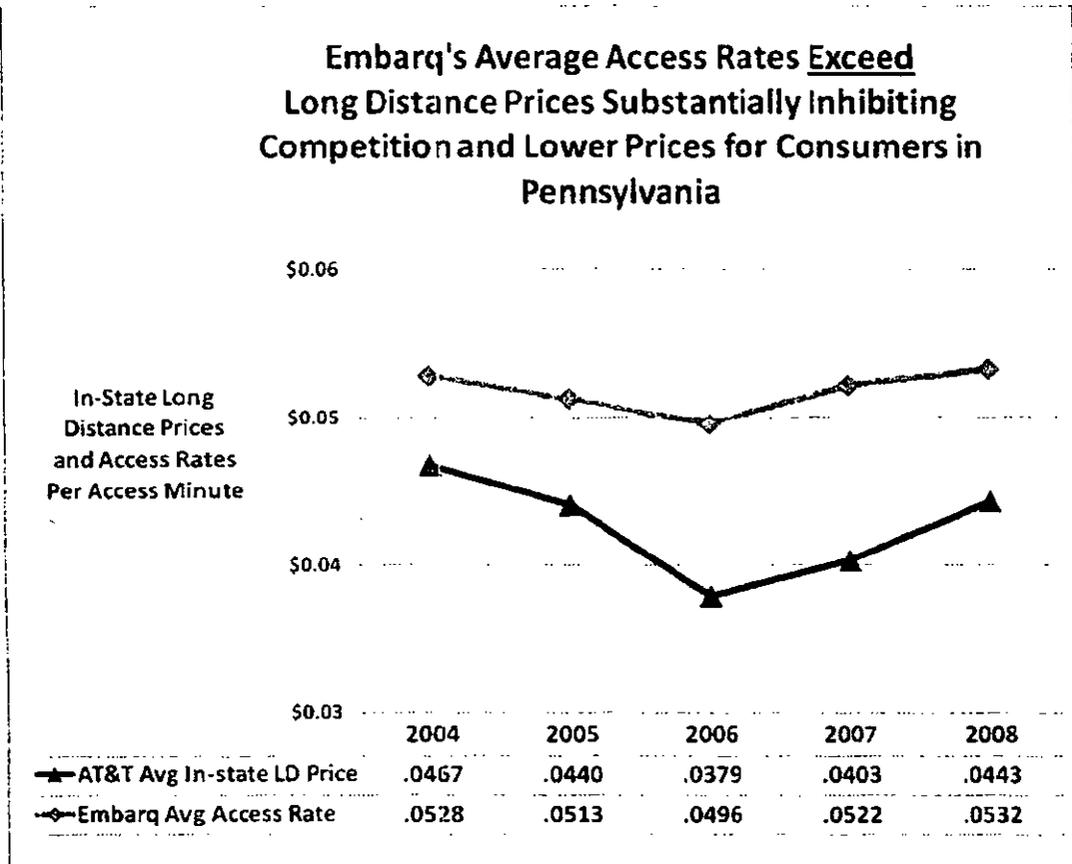
Many of the AT&T personnel responsible for handling such filings are no longer with the company, and the documents requested have not been located after conducting a reasonable search. CenturyLink is free to go to the Commission to review the Commission's records for any such filings. If such filings are labeled as confidential, AT&T agrees that it will provide CenturyLink with the necessary permissions to review the documents pursuant to the terms of the Protective Order entered in this case.

See the attached letter dated April 7, 2004. AT&T does not recall ever receiving the information from ILECs as requested in its letter.

See also AT&T's July 2, 2009 Direct Testimony at page 41 showing that as a result of the intensive competition occurring in the Pennsylvania intrastate long distance communications market, AT&T's average prices to its Pennsylvania customers have fallen faster than AT&T's access expenses. Those price reductions did not occur as a result of any regulatory mandate; intrastate long distance has been price deregulated for a number of years. Rather, those price reductions occurred because the market is fully competitive.

It is also highly relevant to note here that because CenturyLink's (f/k/a Embarq's) access rates have remained so exceedingly high, AT&T's average prices (per access minute of use) are *below* CenturyLink's access rates, and have been for over five years. As the chart at Exhibit H of AT&T's Direct Testimony demonstrates, CenturyLink's access rates actually *exceed* AT&T's

long-distance prices for consumers in Pennsylvania. This widely irrational circumstance has been the status for over five years in CenturyLink's service area, demonstrating that access reform is long overdue:



April 7, 2004

BY OVERNIGHT MAIL

James McNulty, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Re: Joint Access Proposal in Response to
Access Charge Investigation
Docket Nos. M-00021596, P-00991648, and P-00991649

Dear Mr. McNulty:

I am writing on behalf of AT&T Communications of Pennsylvania, LLC., with respect to the Commission's Order, entered in this proceeding on July 15, 2003. In that Order, the Commission approved a Joint Proposal of the Rural Telephone Company Coalition ("RTCC") and Sprint/United Telephone Company of Pennsylvania, under which the companies that were parties to that proposal represented that they would undertake access reductions "of approximately \$25 million within the next eleven months."¹

As AT&T understands it, a number of the incumbent LECs that comprise the RTCC have made individual rate rebalancing filings that purport to implement the Joint Proposal. AT&T has been directly served with only a few of those filings, however. Thus, we have not been able to ascertain whether all of the affected companies have undertaken the rate rebalancing requirements set forth in the Joint Proposal. To the extent we have been able to obtain copies of those filings that have been made (and in even more limited cases, supporting detail regarding a company's specific rate rebalancing proposal), that documentation makes it far from clear that the full amount of the access reductions that had been represented in the Joint Proposal -- and that were subsequently reflected in the Commission's Order -- have been implemented. Indeed, to the extent that the filings that we have obtained permit any calculations to be made,

¹ Order, Docket Nos. M-00021596 et al., July 15, 2003, at 10.

Secretary McNulty
April 7, 2004
Page 2 of 2

they appear to indicate that the total access reductions that have occurred are about half of the \$25 million total reduction that was at the heart of the Joint Proposal.

Accordingly, AT&T recommends that the Commission direct that the incumbent LECs who are parties to the Joint Proposal submit a report detailing the status of their compliance – on an aggregated and company-specific basis – with the terms of that Proposal.

The Commission's Order also directed the IXCs to submit a report "showing how the additional reductions in access charges will reduce the IXCs' average revenue per minute proportionately on a dollar for dollar basis to residential and business customers in Pennsylvania."² At this time AT&T cannot make any report concerning the "additional access reductions" that were supposed to have occurred under the Joint Proposal because, as noted above, AT&T is not privy to whether, and if so to what extent, the incumbent LECs who are parties to the Joint Proposal have in fact reduced their access rates in accordance with their representations to the Commission.

Please do not hesitate to contact me with any questions regarding this submission.

Very truly yours,

Robert C. Barber

Enclosures

cc: (w/ encl)
Elizabeth Barnes, Esq.
Ms. Janet Tuzinski
Service List

² Order, Docket Nos. M-00021596 et al., July 15, 2003, at 11, 14. The legal basis for this directive is, at best, highly problematic. Fundamentally, telecommunications services provided by interexchange carriers are deemed to be competitive services, and thus the rates, terms and conditions of the IXCs' services are not subject to Commission regulation. Moreover, the IXCs cannot be viewed as having acceded to such regulation in this case because they were not parties to the Joint Proposal.

EXHIBIT DFB-10

CONFIDENTIAL

CTL-Sprint 2-18 Since the *Global Order*, identify by year, by incumbent local exchange carrier, by Sprint plan, and by rate the flow through, if any, of intrastate switched access reductions undertaken by Sprint in Pennsylvania. Provide any and all documents submitted to the Pennsylvania Public Utility Commission. Provide any and all documents demonstrating that Sprint flowed through in its rates any intrastate access reductions.

Objection: Sprint objects to the question on the grounds that the question is unduly burdensome, overbroad, and not narrowly tailored, and would cause unreasonable annoyance, oppression, burden and expense. Sprint objects that the time period indicated is overly long and a response would be unduly burdensome. Sprint also objects to the question on the grounds that it seeks information that is subject to the work product doctrine, the attorney-client privilege, or other privilege. Sprint objects that the information requested, and the manner in which it is requested to be produced, would reveal proprietary information, confidential business information, and trade secrets regarding Sprint's business interests and operations. Sprint objects on the grounds that the question seeks information that is not relevant to the subject matter of the proceeding and is not reasonably calculated to lead to the discovery of relevant, admissible information. Subject to and without waiving the foregoing objections, Sprint will provide a response to CenturyLink's question.

Response:

Sponsored By: James A. Appleby

See Sprint's response to OCA-Sprint 1, 3, 6, and 7 (responses served on October 30, 2009).

Supplemental Response:

Since the Global Order, identify by year, by incumbent local exchange carrier, by Sprint plan, and by rate the flow through, if any, of intrastate switched access reductions undertaken by Sprint in Pennsylvania.

The discovery responses earlier identified by Sprint will enable CenturyLink to determine Sprint's average rate, but Sprint is without the data necessary to show whether any intrastate switched access flow-through occurred.

Provide any and all documents submitted to the Pennsylvania Public Utility Commission.

The majority of the Sprint personnel that would have personal knowledge regarding the information sought by this question, and who would have been responsible for the referenced filings, are no longer with the company. A diligent search of Sprint's records has failed to uncover any documents that are responsive to the question. In responding to this question, Sprint is interpreting "any and all

documents submitted to the Pennsylvania Public Utility Commission” to be limited in scope to the purpose of this question (i.e. any and all documents submitted to the Commission *that illustrate or show flow through of intrastate switched access reductions*). If CenturyLink is aware of any such documents that have been filed with the Commission, Sprint is happy to cooperate with CenturyLink in retrieving such documents in the event CenturyLink is unable to retrieve such documents itself.

Provide any and all documents demonstrating that Sprint flowed through in its rates any intrastate access reductions.

As stated above, a diligent search of Sprint’s records has failed to uncover any documents that are responsive to this question.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Investigation Regarding Intrastate :
Access Charges and IntraLATA Toll :
Rates of Rural Carriers and :
The Pennsylvania Universal :
Service Fund :

Docket No. I-00040105

RECEIVED

APR 20 2010

AT&T Communications of :
Pennsylvania, LLC :
Complainant :

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

v. :

Docket Nos. C-2009-2098380, *et al.*

Armstrong Telephone Company - :
Pennsylvania, et al. :
Respondents :

REJOINDER TESTIMONY OF

DAVID F. BONSIK

**ON BEHALF OF
THE UNITED TELEPHONE COMPANY OF PENNSYLVANIA LLC D/B/A
CENTURYLINK**

STATEMENT 3.2

4/15/10
Nbg JX

Pre-Filed April 8, 2010

1 **I. RESPONSE TO PRICE SURREBUTTAL**

2
3 **Q. ARE YOU THE SAME DAVE BONICK THAT FILED DIRECT AND**
4 **SURREBUTTAL TESTIMONY IN THIS CASE**

5 **A.** Yes.

6
7 **Q. ARE THERE NEW, DETAILED PROPOSALS IN SURREBUTTAL**
8 **TESTIMONY TO WHICH YOU NEED TO RESPOND?**

9 **A.** Yes. Verizon witness Don Price proposes using a portion of the current PA
10 USF that he identifies as a “windfall” to partially fund access reductions, with
11 the remainder of funding coming completely from rural ILEC end users,
12 including those of CenturyLink. (Price Surrebuttal, pages 14-18.) Mr. Price
13 largely offers Verizon’s new proposal in response to AT&T’s modified
14 position as set forth in AT&T’s Panel Rebuttal Testimony. Rejoinder
15 Testimony is the only opportunity to respond to Mr. Price on his proposal of
16 “redirecting the current USF windfall.” (Price Surrebuttal at page 15.)

17
18 **Q. DO YOU AGREE THAT THERE IS A “WINDFALL” WITHIN THE**
19 **CURRENT PA USF?**

20 **A.** Absolutely not. The current PA USF is operating as ordered by the
21 Commission and produces the amount of support established by the
22 Commission. Therefore, there is no windfall. Further, as Verizon itself
23 bemoans, ILECs like CenturyLink have lost significant access lines to

24

1 competition while continuing to invest in the PA network, including meeting
2 ongoing commitments to achieve 100% broadband availability under their
3 Chapter 30 plans. It is undeniable that revenue has been lost through competition
4 that would have also contributed toward the provisioning of service in high-cost,
5 rural areas. Thus, isolating one specific element – like USF support -- is
6 misleading and does not recognize the changing complexion of the
7 communications marketplace in rural areas. Rural Pennsylvanian consumers
8 would be adversely impacted by the “redirecting” of USF funds and would be a
9 backward step in this Commission’s long-standing commitment to meaningful
10 universal service policy. As the record demonstrates, this Commission
11 historically balanced universal service/COLR policies rather than singularly
12 promoting the fostering of competition. And, those very same universal
13 service/COLR policies are even more important to rural Pennsylvanians today
14 than they were ten or eleven years ago. Thus, as the Commission makes a
15 determination regarding the final structure and size of the PA USF, it should
16 outright reject Verizon’s self-serving and myopic proposal.

17
18 **Q. DOES VERIZON’S NEW PROPOSAL PRESERVE REASONABLY**
19 **AFFORDABLE RATES AND RELIABLE SERVICE IN RURAL PA**
20 **AND THE REVNUE- NEUTRAULITY REQUIREMENTS OF ACT**
21 **183?**

22 **A.** No. Verizon’s initial position in this case that all revenues can be rebalanced
23 on end-user rates continues to be an untenable position and this new twist on

1 its proposal is no more viable or reasonable. Using AT&T's estimated impact
2 of \$82.6 million, nearly 90% of the revenues lost as a result of mirroring
3 interstate switched access rates would be placed on the backs of rural PA
4 ILEC customers. That may meet Verizon's definition of "an opportunity" for
5 revenue neutrality but CenturyLink does not believe it complies with statute or
6 the Commission's obligations, including ensuring rate and service
7 comparability for rural and urban areas of Pennsylvania. Sure, the math can
8 work if you force basic rates (and other rates) far above the level any Verizon
9 PA subscriber is currently paying and implement immediate increases across
10 the board in every bundled line and business rate may work. But, numbers on
11 paper do not preserve and advance universal service unless the revenue is
12 viable and sustainable. Verizon's attempt at "redirecting" the USF fails to
13 remedy any such fundamental flaws in Verizon's position.

14
15 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

16 **A.** Yes.