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

In the Matter of

Lifeline and Link Up Reform and Modernization
Lifeline and Link Up
Federal-State Joint Board on Universal Service
Advancing Broadband Availability Through Digital Literacy Training

WC Docket No. 11-42
WC Docket No. 03-109
CC Docket No. 96-45
WC Docket No. 12-23

REPLY OF THE AMERICAN PUBLIC COMMUNICATIONS COUNCIL, INC. TO OPPOSITIONS TO PETITION FOR PARTIAL RECONSIDERATION

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SUMMARY

APCC’s Petition for Reconsideration proceeds from three basic uncontested factual propositions. Payphones serve low income people. Payphones are at the margin of profitability. Payphones are on the verge of disappearing. According to the Commission, there will be millions of low income Americans who will be without basic voice service even if the Commission’s Lifeline program achieves all its stated goals. Payphones have played and can continue to play a critical role in providing service to these groups. Although APCC’s original petition was framed in terms of Lifeline support for payphone line service, APCC seeks to have the Commission initiate a rulemaking in which all the options for providing support for these payphone lines that serve low income consumers can receive appropriate support.

The oppositions raise only two arguments that merit any comment. They are simply wrong when they say a majority of residential customers must have subscribed to a service for it to be eligible for coverage. The correct reading of Section 254(c)(1) is that a service meeting all the criteria in that subsection must be covered by universal service but the Commission has discretion to include other services. In any event, the Commission can forbear on its own motion from applying Section 254(c)(1) and should do so here.

In a rulemaking, the Commission could determine the appropriate classification for payphone providers to qualify payphone lines for universal support. The issue is not the classification of the service or the provider, but whether universal support should be available to a service serving virtually serving only, and filling a gap in service for, low income consumers.

Attempting to bring the support of payphones under the rubric of public interest payphones is not viable. Section 276(b)(2) was designed to address the limited circumstances
where there is a market failure. It is not efficient for either payphone providers or regulators as a vehicle for the broad support of payphones.
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The American Public Communications Council ("APCC") hereby replies to the Oppositions filed in response to APCC’s Petition for Reconsideration ("APCC Recon").

Oppositions were filed by four parties: Comments of the National Association of State Utility Consumer Advocates On Petitions for Reconsideration ("NASUCA Opp"); Comments on Petitions for Reconsideration of Sprint Nextel Corporation ("Sprint Opp"); Opposition of the United States Telecom Association ("USTA Opp"), and Opposition of Verizon ("Verizon Opp").

INTRODUCTION

The APCC Petitions proceed from a simple set of basic facts. Payphones now serve low income people, and indeed for all practical purposes, only low income people.³ Payphones are at the margin of profitability.⁴ They are on the verge of disappearing.⁵

The issue raised by the APCC Petitions is straight-forward: whether as part of the program mandated by Congress of attempting to foster universal service, and service to low income people.

³ No party seriously disputes at all that payphones serve low income people. It is not someone with a working mobile phone in their pocket or purse or on their hip who uses a payphone, as APCC has repeatedly pointed out. See e.g., APCC Recon at n.18 and accompanying text.

(And for those parties, like Sprint (Sprint Opp at 5-6), and USTA (USTA Opp at 2) who complain that APCC restates its position, that is because the opposing parties keep saying the same foolish things, like “there is no proof that low income people use payphones and only payphones targeted to the low income people should even be under discussion.” NASUCA Opp at 3, USTA Opp at 3. Who do they think is using payphones? Do they think people ride an elevator down from their condos, or go park their cars, or interrupt their shopping at the mall, or stop walking to their departure gate, to go use a payphone when they have a smartphone at hand? It is the people who are in the condo to clean it or who live in the apartment house with stairs and no elevator, or who may not have a car, or who are at the mall because it is where they do low wage maintenance work, or who is a low income traveler on a low budget or who work at the airport food stand, who are using the payphones.)

It may or may not be accurate that it is not necessarily low income people who would qualify for the Commission’s Lifeline program who would be using payphones. (But there are and will be plenty of low income people who do meet the Commission’s guidelines using payphones as well --if they have access to any service at all. As APCC has pointed out, (APCC Recon at 9) the Commission itself recognizes that even if the Commission’s program is 100% successful, there will still be 49% of the eligible low income population not served by the program. What phones are the unserved going to use if not payphones?) But is the Commission going to say it really makes a difference in terms of the universal service objectives which low income people are using the payphones? It will clearly be low income people, by definition, since they are the ones who don’t have any other service.

Moreover, it is simply not feasible to demonstrate that the majority of users of payphones are low income people qualifying under the Commission’s criteria. Even if it were otherwise economically feasible to commission a survey worker to stand at enough payphones for enough hours of enough days to get a valid sampling, which of course it is not, the practicalities of approaching each user of the payphone and attempting to get the caller to provide the kind of information necessary to show qualification under the Commission guidelines are insurmountable. Callers are not going to provide that information in the circumstances under which the information would have to be gathered. And even if the survey taker did manage to get the caller to answer the necessary questions, a pretty unlikely outcome, there is no practical way to validate the information. At some point, common sense has to prevail about who is using payphones.

⁴ Nor should there be any confusion here. Despite USTA’s attempts at obfuscation, what APCC is seeking is crystal clear: Lifeline support for payphone line service. USTA introduces a garbled discussion of “affordability” and “high cost.” USTA Opp at 2-3. Lifeline support is a universal service mechanism provided in high cost areas and all other areas. APCC’s proposals are totally unrelated to high cost support.

⁵ The dramatic and accelerating decline in the number of payphones deployed is already in the record. E.g., Payphone Line Support Rulemaking Petition at 8-11. APCC notes that based on the data available to it, this trend is continuing and fewer and fewer payphone providers continue as viable business entities.
income people in particular, the Commission is willing to open a rule making to assess and explore whether maintaining payphones through providing Lifeline support to ETCs who provide dial tone to payphones is a necessary complement to the Commission’s Lifeline program or whether some other vehicle is appropriate and, in the interim while the issue is explored, provide the support on an interim basis. In such a rulemaking, the Commission could fully explore the range of options for addressing the gaps in service currently filled by payphones, and how, if it is necessary at all, those gaps will be addressed if payphones are allowed to disappear.

As we demonstrate below, there is not a serious question of legal authority or meeting statutory requirements. Even if there were, the Commission, as it has demonstrated in the case of non-facilities based mobile services providers offering Lifeline service, has ample waiver and forbearance authority. And while the Commission has wide discretion in using the forbearance and waiver tools, that discretion is not unbounded; the Commission cannot exercise its discretion in a manner that leaves a competitively discriminatory scheme in place.

ARGUMENT

The Oppositions have raised only two arguments that have sufficient merit to warrant any lengthy response. In addition, there are a few other points to be made.

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6 The interim relief would be limited to payphones existing as of the date of the Commission’s order granting the relief. Moreover, as APCC has explained, there is no real likelihood that any meaningful number of payphones would be placed as a result of granting interim or permanent relief. See Payphone Line Support Rulemaking Petition at n.62. In any event, as part of the rulemaking, the support could be adjusted to cover only those lines that warrant support. No party has questioned the Commission’s authority to provide interim relief.
Several of the Oppositions seize upon the requirement of Section 254(c)(1)(B), 47 USC §254(c)(1)(B), of the Act that the Commission “shall consider the extent to which” a service is “subscribed to by a substantial majority of residential customers.” They argue that it is mandatory that a service meet this threshold to be eligible for universal service support. They are wrong, and they have stood the purpose of Section 254(c)(1) on its head.

The legislative history makes clear that the Commission has discretion in considering whether to provide universal support for a service not meeting a criterion in Section 254(c)(1).
The purpose of Section 254 was to require the Commission to make a service eligible for universal service support if it met the criteria contained in Section 254(c)(1) but not to preclude from eligibility for support a service that did not meet all the criteria.

The House version of Section 254(c)(1) enumerated in slightly different order and in slightly different language the four criteria contained in the current statute. The Committee Report explained that the specific “factors included in subsection (c) are intended to” provide guidance “in walking the fine line between including new services too fast, and risk increasing prices dramatically and ‘gold plating’ the network, and being slow to include the services.” Thus, the House was concerned about caution being exercised in including new services but did not require the Commission to include or exclude any service in the services eligible for universal support.

The Senate version of the bill took a different approach. It included only one explicit criterion in what became Section 254(c)(1) but required that “At a minimum, universal service shall include any telecommunications services” that have “been subscribed to by a substantial majority of residential customers.” The Committee Report stated that “the subsection requires the FCC to include, at a minimum, any telecommunications service that is subscribed to by a substantial majority of residential customers.” Thus the Senate bill intended to make it mandatory for any service meeting the specified criterion to be eligible for universal service, but

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9 Id. 80


11 Senate Report at 27.
clearly left it open for services not meeting this standard to be eligible for universal support.

In the Conference Report on the legislation, “[t]he House recede[d] to the Senate with modifications.” 12 Although the three additional specific criteria contained in the House bill but not contained in the Senate version of the bill were added to the final legislation, there is no indication of any intent to depart from the Senate approach of requiring a telecommunication service meeting all of the specified criteria to be eligible for universal service support. Indeed the House receded to the Senate approach. At the same time, the Commission is still to consider all the criteria. 13

From this history, the correct reading of the statute can be discerned: the Commission must include in the definition of universal service a telecommunication service meeting all the criteria of Section 254(c)(1) but may, upon consideration of the specific criteria of Section 254(c)(1), include a service that does not meet all the criteria. Thus the fact that a majority of residential customers have not subscribed to payphone line service is not a bar to the Commission’s including payphone line service in the services eligible for universal support.

In any event, even if this were not the correct reading of the statute, the Commission is free on its own motion to forbear from applying this provision, as it did with the facilities based requirement of Section 214(e) in the case of non-facilities based wireless providers. 14 Certainly the three requirements of Section 10(a) of the Act, 47 U.S.C. §160(a), are met.


13 Id. 131.

14 Lifeline Order at ¶¶368-378.
There is no question but that it is not necessary to enforce the requirement that a substantial majority of residential customers have subscribed to payphone service in order to ensure that the rates, charges practices, classifications or regulations at payphones are just and reasonable and not unjustly or unreasonably discriminatory. The Commission long ago made a determination that payphones face sufficient competition for the market to discipline practices and rates. 15 Payphones continue to be under extreme competitive pressure. Indeed, the wireless carriers who the Commission found face enough competitive pressure from each other to warrant forbearance are also competitors of the payphone providers.

Similarly, there is no question but that forbearing from applying the requirement that a substantial majority of residential customers subscribe to payphone service is not necessary for the protection of consumers. The same forces that support forbearance under Subsection (a)(1) of Section 10 support forbearance under subsection (a)(2) as well. The duty of payphones to allow access to 911 services and free to the caller toll free calling remain in place.

Section 10(a)(3) requires the Commission to find that forbearance is in the public interest. In the course of this determination, the Commission is obliged to consider the effects on competition of forbearance. Forbearing from applying the requirement that a majority of residential customers subscribe to payphone service will benefit competition. Payphones impose market discipline by providing an alternative to prepaid wireless providers who might otherwise charge high rates for excess minutes because payphones allow unlimited local calling for a flat

rate and offer inexpensive coin paid long distance. Thus, the public interest requirement of the forbearance statute is also satisfied.

While the Commission of course has discretion in administering the Act, that discretion is not unbounded. In the APCC Recon, APCC discussed at length that the Commission’s grant of Lifeline support to wireless carriers without similar relief for payphone line service violated the Commission’s own principle of competitive neutrality. Similarly, the Commission’s failure to use its forbearance authority in an even-handed manner could raise issues of the Commission’s failure to follow its own guidelines or discriminating in the application of the guidelines. For these reasons, if the Commission determines that Section 254(c)(1) requires a service be subscribed to by a majority of residential customers before it is eligible for universal support, the Commission should on its own motion forbear from applying that provision to payphone line service.

II. THE APPROPRIATE CLASSIFICATION OF PAYPHONE SERVICE PROVIDERS

The Commission was troubled by APCC’s proposal to reclassify payphone service providers (“PSP”s) as low income consumers in order to make the payphone line service eligible for Lifeline support. Reclassifying the PSPs into an end user class also had the effect, intended by APCC for all the reasons explained in the APCC Recon, of relieving PSPs of the obligation to pass on to callers at payphones the rate reduction passed on to the PSPs by the

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16 APCC Recon at 19-22.
17 Sprint’s objection, Sprint Opp at 5, that it would violate the Commission’s rules for the Commission to provide Lifeline support to payphone line service because PSPs are not low income consumers is of course circular and begs the question entirely. The whole purpose of the Payphone Line Support Rulemaking Petition was to put PSPs in the category of “low income consumers.”
18 APCC Recon at 4-11.
ETCs who actually receive the Lifeline support money. The Commission was concerned that the net effect would be to give PSPs a “windfall.”

The APCC Recon discussed at length why it is not feasible to pass on the reduction, why passing on the reduction would not result in any additional service to low income consumers or mean they could afford more service, and why it would defeat the purpose of the Lifeline support. 19 We will not repeat that discussion here except to observe that given the low profitability of payphones, the purpose of the Lifeline support would be to preserve universal service by keeping in service payphones that will otherwise soon disappear.

Reclassifying payphone providers as low income consumers seemed the simplest, most direct way to reach these results. In a rulemaking, other ways to reach the result or other classifications could be explored.

The main issue of course is not how to classify payphone providers to reach the desired result. The issue is whether the result is desirable. APCC recognizes that its request requires a different perspective; universal support for a service provider who provides service only to and whose users are virtually all low income consumers. Perhaps there is a better way to go than addressing the classification of payphone providers. But that is the kind of discussion that can best be thrashed out in a rulemaking proceeding.

The opponents do not really rebut APCC’s points except to say that payphones are a dying technology unable to compete (Sprint Opp at 6) or express their view that the money spent on payphone line support would be better spent on more support for wireless. (Verizon Opp at

19 Id.
3.) Both miss the point. Support will mean payphones will remain available to serve those low income consumers who, by the Commission’s own projections, will not make it on to wireless services or into the Commission’s programs. That is a major point of the APCC Petitions. But even if payphones disappear over the next few years because wireless service or the Commission’s programs do succeed in reaching all low income consumers, it means the Lifeline support for payphone line service will also disappear, since the payphone usage will stop. But in the meantime, many low income consumers who otherwise would have had no service will have had the benefit of service until wireless or other service became available to them, if it ever does. When seen this way, providing Lifeline support for payphones is practically a no lose proposition for universal service; there will be service if there is a need for it, and that service will go away, along with the support for it, if it is no longer needed.

III. OTHER ISSUES

A. Section 276 Public Interest Payphones

As it did in the earlier phase of this proceeding, NASUCA favors using Section 276(b)(2) of the Communications Act, which provides for the FCC to designate public interest payphones, for dealing with payphones needing support. There are several difficulties with NASUCA’s proposal.

Section 276 was not designed to be a program to provide support to payphones for low income groups. It was designed to fill the gaps in payphone deployment in an otherwise robust, competitive payphone market, as its very language indicates. Public interest payphones have to

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20 Verizon observes that "virtually every American" has a mobile phone. Verizon Opp at 3. It ignores the data cited by APCC showing that the penetration of mobile phones among low income consumers continues to lag behind that of the rest of America. See Payphone Line Support Rulemaking Petition at 11-13.

21 NASUCA Opp at 3-4. Verizon also argues for the use of Section 276(b)(2). Verizon Opp at 3.
be applied for on an individual basis \(^{22}\) and are inadequate to address a broad program like providing service for low income groups.

The very example cited by NASUCA, a program in Maine, illustrates all these points. Before turning to that discussion, APCC does observe that so far as APCC is aware, the Maine program is the only one still existing. There may be an isolated phone or two still supported in a few states, but as far as APCC is aware, Maine’s program is the most extensive. \(^{23}\) And the Maine program illustrates why these Section 276 programs are inadequate to and were not designed to address problems of providing service on a broad basis to low income consumers.

Attachment A is the list of payphones shown on the Maine PUC’s web site as currently supported under the Maine program. Even a casual review of the locations makes clear these payphones were placed for reasons having little to do with targeting low income users. At least 26 of the 38 phones listed were in police or fire stations, post offices, schools, or other public buildings. Another 4 are at recreational facilities, which are generally payphones placed to allow children to call for pick up, arrange meeting places, etc. Two additional payphones are at public docks and one is at an “Information Booth.” Five appear to be at commercial establishments, and it is unclear why they qualify as public interest payphones. What is clear is that whatever civic purposes these phones are serving, no more than one or two are there because they are to serve the low income. \(^{24}\) Moreover, a telephone inquiry revealed that the contract to provide

\(^{22}\) NAATCA clearly envisions a program administered on a phone by phone basis and a program designed to serve very limited locations. NASUCA Opp at 3-4.

\(^{23}\) APCC did state in the APCC Recon, at 23, that there were no public interest payphone programs in effect. The statement was based on the best information then available to APCC. APCC regrets any inconvenience caused by the statement.

\(^{24}\) Indeed while NASUCA advances several tentative guidelines for public interest payphones its examples of supported payphones are those in “remote stretches of roads, remote transportation pi
some or all the public interest payphones is let periodically, (the current contract runs for two
years) and applications for new public interest phones are only entertained to coincide with the
letting of the contract. Whether there are any public interest payphones is entirely dependent on
renewal of funding by the Maine legislature.

It is plain that programs such as these are inadequate to meet a federal mandate to
provide service to low income groups. And as mentioned above, so far as APCC is aware,
Maine’s program is the only active program. The history of the programs in the states, to which
the Commission delegated responsibility and funding, demonstrates that the states had difficulty
getting and keeping programs. State commissions couldn’t find staff to administer the program.
Similarly and equally important, payphone providers, who are small independent businesses,
found the costs associated with the application process and the program too high, even when
payphone provider companies were larger and could spread overheads.\(^{25}\) Because of these
barriers, no more than a handful of payphones were ever supported under these programs. These
same barriers would exist if the program were moved to the federal level, as NASUCA seems to
suggest.\(^{26}\)

Moreover, for public interest payphone programs to support a meaningful number of
payphones, funding would become an issue. There is no federal source of funding other than
universal service. The Commission realistically probably could not start a new funding program.
The universal service program is the only feasible way to get the program done.

In any event, it elevates form over substance to move to the Section 276 route. As

\(^{25}\) This is particularly true since all the major LECs have left the payphone business. The remaining payphone
providers are all small businesses.

\(^{26}\) NASUCA Opp at 4.
discussed, there is no question but that payphones today overwhelmingly serve low income consumers and should be embraced in a program designed to ensure universal service. To the extent there are concerns that Lifeline/Low Income is not the correct mechanism, that could be addressed in the rulemaking proceeding.

B. Repetitive Arguments

Several parties also argue that APCC advances no arguments not already advanced in its original petition and rejected by the Commission in the Lifeline Order. 27 This is incorrect. As APCC points out, many of the concerns raised by the Commission in the Lifeline Order could not be anticipated and were not addressed in the earlier phase of this proceeding. 28 Moreover, the Commission did not address many of the arguments advanced by APCC in the earlier phase of this proceeding and administrative principles of exhaustion may require APCC to give the Commission an opportunity to address them in order to perfect the record for review. 29

CONCLUSION

For the foregoing reasons and the reasons advanced in the APCC Recon, the Commission should grant the Petition for Partial Reconsideration, order interim relief, and initiate a

27  E.g., Sprint Opp. 5-6.

28  See, e.g., APCC Recon at 4-11. In the course of raising some of these arguments, APCC did repeat some material that was a predicate for the argument.

rulemaking to determine whether to provide and the nature of support to be provided to payphone line service.

Respectfully Submitted,

[Signature]

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