

VOLUME 1

DESCRIPTION AND JUSTIFICATION

I. Introduction

A. Background

Windstream Telephone System Tariffs FCC No. 6 and 7 issuing carriers as listed in Exhibit COSA (Windstream) hereby submit this filing in support of implementation of the requirements of the Federal Communications Commission's Business Data Services Order (BDS Order)¹ and includes adjustments consistent with the requirements of Sections 61.41 through 61.49 of the Commission's Rules.

This information is being filed on 15 days' notice pursuant to the Federal Communications Commission's (Commission) streamlined filing procedures.

In compliance with the BDS Order, Windstream has implemented the designation of DS1 and DS3 end user channel terminations as competitive or noncompetitive based on the Commission's market test designation of the county in which the service is provided. Windstream utilized the list of counties and their respective designations released by the Wireline Competition Bureau (WCB) in their Public notice dated May 15, 2017 to complete the assignment process of the competitive and noncompetitive designations at the county level. Rates, terms and conditions for end user channel terminations provided in wire centers where the physical address of the wire center is in a county or county equivalent designated as competitive

¹ *Business Data Services in an Internet Protocol Environment et al.*, WC Docket No. 16-143 et al., Report and Order, 32 FCC Rcd 3459 (2017) (*Business Data Services Order*).

pursuant to the FCC's list of competitive and non-competitive counties will be provided pursuant to the rates, terms and conditions of the Windstream ILEC Interstate Business Data Services Guidebook. Special Access end user channel terminations for services provided in wire centers where the physical address of the wire center is in a county or county equivalent designated as non-competitive pursuant to the FCC's list of competitive and non-competitive counties will be provided pursuant to the rates, terms and conditions of this tariff. A list of counties and their noncompetitive designations for each Windstream study area are contained in Exhibit A and B hereto. All other exchanges and counties in each Windstream Study Area are deemed competitive.

As required by the BDS Order, Windstream has designated certain other Special Access services as competitive in all study areas in accordance with the Commission's BDS services market analysis. These competitive services include: all packet-based business data services; circuit-based data services above the DS3 bandwidth level; transport service, which includes interoffice facilities, channel terminations between the serving wire center and point of presence, and all sub-elements established for the use of these transport facilities; DS1 & DS3 end user channel terminations and other special Access services in an area for which the company was granted Phase II Pricing Flexibility prior to June 2017.

B. Detariffed Services

This filing removes from FCC No. 6 and 7 all Special Access services deemed competitive by the Commission's market analysis and Special Access services provided in an area for which the company was granted Phase II Pricing Flexibility prior to June 2017. Detariffed Special Access services include:

- Packet-based business data services;

- Circuit-based data services above the DS3 bandwidth level;
- Transport services, including interoffice facilities, channel terminations between the serving wire center and point of presence, and all sub-elements established for the use of transport facilities;
- DS1 & DS3 end user channel terminations and other special Access services in an area for which the company was granted Phase II Pricing Flexibility prior to June 2017; and
- DS1 & DS3 end user channel terminations and other special access services in any competitive county.

C. Waivers

Windstream lists below all currently applicable waivers that permit rate elements different than those specified in 47 C.F.R., Part 69.

The Commission in Memorandum Opinion and Order, *In the Matter of Annual 1989 Access Tariff Filings*, DA 88-1872, Released December 2, 1988, extended indefinitely the waiver allowing carriers to bill \$25.00 for a special access surcharge. This element is included in Windstream's Common Line basket.

The Commission in Memorandum Opinion and Order, *In the Matter of Lincoln Telephone and Telegraph Company Petition for Waiver of Part 69*, DA 89-654, Released June 21, 1989, granted a waiver allowing (then) Lincoln to establish a separate rate element for 900 Access Service. This element is included in Windstream's Local Switching service category within the Traffic Sensitive Basket.

The Commission in Memorandum Opinion and Order, *In the Matter of Lincoln Telephone and Telegraph Company Petition for Waiver of the Commission's Rules To Establish 500 Access Service*, DA 95-115, Released January 26, 1995, granted a waiver allowing (then) Lincoln to establish a separate rate

element for 500 Access Service. This element is included in Windstream's Local Switching Service category within the Traffic Sensitive Basket.

The Commission in Memorandum Opinion and Order, *In the Matter of United States Telephone Association Petition for Waiver of Section 69.152 (b) and 69.153 (c) (1) of the Commissions Rules*, DA 99-1122, released June 8, 1999, granted a waiver to allow price cap LECs to use USTA's proposed interim calculations only when necessary to compensate for an anomaly that produces negative multi-line business PICCs.

The Commission in Order, *In the Matter of Windstream Petition for Conversion to Price Cap Regulation and for Limited Waiver Relief*, DA 08-81, Released March 18, 2008, provided Windstream with the needed relief to allow Windstream to convert its rate-of-return regulation companies to price cap regulation and establish initial price cap indexes (PCIs) for price cap baskets.

The Commission in Order, *In the Matter of Windstream Petition for Limited Waiver Relief*, WC Docket No. 10-55, DA 10-802, Released May 10, 2010, provided Windstream with the needed relief to allow Windstream Lexcom to convert to price cap regulation and establish initial price cap indexes (PCIs) for price cap baskets.

The Commission in Order, *In the Matter of Windstream Petition for Limited Waiver Relief*, WC Docket No. 11-36, DA 11-966, Released May 27, 2011, provided Windstream with the needed relief to allow Windstream Lakedale, Inc. to convert to price cap regulation and establish initial price cap indexes (PCIs) for price cap baskets.

The Commission in Order, *In the Matter of Joint Petition of Price Cap Holding Companies for Conversion of Average Schedule Affiliates to Price Cap*

II. Index and Rate Development

As a result of the competitive designation for all Special Access services offered by Windstream in certain study areas and the detariffing of all such services, no Tariff Review Plan ("TRP") calculations are necessary and TRP-related exhibits for those COSAs are excluded from this filing.

A. Existing Indices

The existing indices are those indices that will be in effect on November 30, 2017. See IND-REF for transmittal numbers under which existing indices became effective.

B. PCI Development

In accordance with the Commission's Rules, the PCIs for each service basket were calculated as shown in Exhibit PCI-DEV using a GDP-PI factor of 1.5385% as applied in the Windstream 2017 Annual TRP filing and an X-factor of 2.0 percent as directed by the 2017 BDS TRP Notice².

C. Excluded Services

Exhibit OUTPC-1 and 2 provides a detailed listing of those services which are not included under price cap regulation.

III. Conclusion

² *In the Matter of Business Data Services in an Internet Protocol Environment et al.*, (Business Data Services Order), WCB/Pricing File No. 16-143 (DA 17-109), released October 13, 2017 (2017 BDS TRP Notice).

Windstream is submitting the accompanying information consistent with the requirements of the Commission's price cap regulations for local exchange carriers. The adjustments proposed herein are demonstrated to be just and reasonable, and are supported by detailed exhibits reflecting the calculation of the required revisions as designated by the Commission.

EXHIBIT COSA

Issuing Carrier	COSA
Windstream Alabama	WSAL
Windstream Arkansas	WSAR
Windstream Florida	WSFL
Georgia Properties ³	WSGP
Windstream Standard	WSST
Windstream Kentucky West	WSKY
Windstream Kerrville	WSKR
Windstream Mississippi	WSMS
Windstream Missouri	WSMO
Windstream North Carolina	ALNC
New York Properties ⁴	WSNY
Windstream Ohio	WSOH
Oklahoma Properties ⁵	WSOP
Windstream Pennsylvania	ALPA
Windstream South Carolina	WSSC
Windstream Sugar Land	WSSL
Texas Windstream	WSTX
Windstream Western Reserve	ALWR
Windstream Concord	WSCT
Windstream Lexcom	WSLX
Windstream Nebraska	LTNE
Windstream Kentucky East – Lexington	GTKY
Windstream Kentucky East – London	COKY
Valor Oklahoma	VAOK
Valor New Mexico No. 1	VANM
Valor New Mexico No. 2	VANN
Valor Texas No. 1	VATX
Valor Texas No. 2	VCTX
Windstream Lakedale, Inc.	WSLD
Windstream Lakedale, Inc. - Connections	WSSB
Windstream Montezuma	WSMZ
Windstream Accucomm	WSAC
Windstream Georgia Telephone	WSGT
Windstream Buffalo Valley	WSBV
Windstream Conestoga	WSCS
Windstream D&E	WSDE

³ Georgia Properties includes Windstream Georgia, Georgia Windstream and Windstream Georgia Communications.

⁴ New York Properties includes Windstream New York – Fulton, Windstream New York – Jamestown and Windstream New York – Red Jacket.

⁵ Oklahoma Properties includes Windstream Oklahoma and Oklahoma Windstream.

Exhibit A

List of Non-Competitive Exchanges and Counties FCC #6

Wire Center	COSA	State	County
AHVLALXA	WSAL	AL	ST CLAIR
LEDSALXA	WSAL	AL	ST CLAIR
LEDSALXB	WSAL	AL	ST CLAIR
ODVLALXA	WSAL	AL	ST CLAIR
SPVLALXA	WSAL	AL	ST CLAIR
AMTYARXA	WSAR	AR	CLARK
BGLWARXA	WSAR	AR	PERRY
BRDNARXA	WSAR	AR	OUACHITA
COVEARXA	WSAR	AR	POLK
CRSTARXA	WSAR	AR	ASHLEY
CRTHARXA	WSAR	AR	DALLAS
DASYARXA	WSAR	AR	PIKE
DEQNARXA	WSAR	AR	SEVIER
DLGHARXA	WSAR	AR	PIKE
DLRKARXA	WSAR	AR	DALLAS
DMSCARXA	WSAR	AR	VAN BUREN
DRCKARXA	WSAR	AR	MADISON
DRKSARXA	WSAR	AR	HOWARD
ELANARXA	WSAR	AR	PHILLIPS
FRDYARXA	WSAR	AR	DALLAS
GLHMARXA	WSAR	AR	SEVIER
GLWDARXA	WSAR	AR	PIKE
HORTARXA	WSAR	AR	SEVIER
HTFDARXA	WSAR	AR	POLK
LCBGARXA	WSAR	AR	SEVIER
LEOLARXA	WSAR	AR	GRANT
LESLARXA	WSAR	AR	SEARCY
MGTNARXA	WSAR	AR	VAN BUREN
MRBOARXA	WSAR	AR	PIKE
MRSHARXA	WSAR	AR	SEARCY
MTIDARXA	WSAR	AR	MONTGOMERY
NMRDARXA	WSAR	AR	PERRY
NRMNARXA	WSAR	AR	MONTGOMERY
ODENARXA	WSAR	AR	MONTGOMERY
OKLNARXA	WSAR	AR	CLARK
PNGBARXA	WSAR	AR	WHITE
PRRYARXA	WSAR	AR	PERRY
PRVIARXA	WSAR	AR	GRANT
PRVLARXA	WSAR	AR	PERRY

Exhibit A

List of Non-Competitive Exchanges and Counties FCC #6

Wire Center	COSA	State	County
QTMNARXA	WSAR	AR	CLEBURNE
RSBDARXA	WSAR	AR	WHITE
SFRCARXA	WSAR	AR	PERRY
SHRDARXA	WSAR	AR	GRANT
SPRKARXA	WSAR	AR	DALLAS
STPLARXA	WSAR	AR	MADISON
SWTNARXA	WSAR	AR	JACKSON
TCMNARXA	WSAR	AR	JACKSON
UMPRARXA	WSAR	AR	HOWARD
WCKSARXA	WSAR	AR	POLK
WLMTARXA	WSAR	AR	ASHLEY
WTSPARXA	WSAR	AR	SEARCY
BORAFLXA	WSFL	FL	SUWANNEE
BRFRFLXA	WSFL	FL	SUWANNEE
CRCYFLXA	WSFL	FL	PUTNAM
DWPKFLXA	WSFL	FL	SUWANNEE
FLRHFLXA	WSFL	FL	PUTNAM
INTRFLXA	WSFL	FL	PUTNAM
JNGSFLXA	WSFL	FL	HAMILTON
JSPRFLXA	WSFL	FL	HAMILTON
LKBTFLXA	WSFL	FL	UNION
LRVLFLXA	WSFL	FL	SUWANNEE
LVOKFLXA	WSFL	FL	SUWANNEE
MAYOFLXA	WSFL	FL	LAFAYETTE
MLRSFLXA	WSFL	FL	PUTNAM
RAFRFLXA	WSFL	FL	UNION
WHSPFLXA	WSFL	FL	HAMILTON
WLBFLXA	WSFL	FL	SUWANNEE
HOMRGAXA	WSGP	GA	BANKS
LXTNGAXA	WSGP	GA	OGLETHORPE
MXYSGAXA	WSGP	GA	OGLETHORPE
UNPNGAXA	WSGP	GA	GREENE
WHPLGAXA	WSGP	GA	GREENE
ABVLGAXA	WSGP	GA	WILCOX
ASBNGAXA	WSGP	GA	TURNER
BFTNGAXA	WSGP	GA	CLAY
BNVSGAXA	WSGP	GA	MARION
EDSNGAXA	WSGP	GA	CALHOUN
ELVLGAXA	WSGP	GA	SCHLEY

Exhibit A

List of Non-Competitive Exchanges and Counties FCC #6

Wire Center	COSA	State	County
ENLLGAXA	WSGP	GA	STEPHENS
FTGNGAXA	WSGP	GA	CLAY
IDELGAXA	WSGP	GA	MACON
MNCHGAXA	WSGP	GA	MERIWETHER
MRGNGAXA	WSGP	GA	CALHOUN
MRVLGAXA	WSGP	GA	MACON
MRVNGAXA	WSGP	GA	BROOKS
MTVRGAXA	WSGP	GA	MONTGOMERY
MTZMGAXA	WSGP	GA	MACON
PSTNGAXA	WSGP	GA	WEBSTER
QTMNGAXA	WSGP	GA	BROOKS
TOCCGAXA	WSGP	GA	STEPHENS
WDLGAXA	WSGP	GA	TALBOT
WRSPGAXA	WSGP	GA	MERIWETHER
ALAMGAXA	WSGP	GA	WHEELER
CLNSGAXA	WSGP	GA	TATTNALL
CYTNGAXA	WSGP	GA	RABUN
DAVLGAXA	WSGP	GA	TWIGGS
DLRDGAXA	WSGP	GA	RABUN
DNVLGAXA	WSGP	GA	SEMINOLE
FARGGAXA	WSGP	GA	CLINCH
GLNVGAXA	WSGP	GA	TATTNALL
GRAYGAXA	WSGP	GA	JONES
HDDCGAXA	WSGP	GA	JONES
HMVLGAXA	WSGP	GA	CLINCH
IRCYGAXA	WSGP	GA	SEMINOLE
JAKNGAXA	WSGP	GA	EARLY
JFVLGAXA	WSGP	GA	TWIGGS
LDWCGAXA	WSGP	GA	LONG
MTRSGAXA	WSGP	GA	LAURENS
PITSGAXA	WSGP	GA	WILCOX
PNVWGAXA	WSGP	GA	WILCOX
RBCCGAXA	WSGP	GA	TURNER
RCHEGAXA	WSGP	GA	WILCOX
RDVLGAXA	WSGP	GA	TATTNALL
RYVLGAXA	WSGP	GA	SEMINOLE
UVLDGAXA	WSGP	GA	MONTGOMERY
BGCNGAXA	WSST	GA	DAWSON
BLVIGAXA	WSST	GA	UNION

Exhibit A

List of Non-Competitive Exchanges and Counties FCC #6

Wire Center	COSA	State	County
BTVLGAXA	WSST	GA	HABERSHAM
CLEVGAXA	WSST	GA	WHITE
CLVLGAXA	WSST	GA	HABERSHAM
CRNLGAXA	WSST	GA	HABERSHAM
DHLNGAXA	WSST	GA	LUMPKIN
DWVLGAXA	WSST	GA	DAWSON
DWVLGAXB	WSST	GA	DAWSON
HELNGAXA	WSST	GA	WHITE
HWSSGAXA	WSST	GA	TOWNS
SCHSGAXA	WSST	GA	UNION
YNHRGAXA	WSST	GA	TOWNS
BLLPIAXO	ITTC	IA	BENTON
CNRYIAXO	ITTC	IA	IOWA
DELTIA XO	ITTC	IA	KEOKUK
FRBNIA XO	ITTC	IA	BUCHANAN
GDJTIA XO	ITTC	IA	GREENE
HRPRIAXO	ITTC	IA	KEOKUK
HZTNIA XO	ITTC	IA	BUCHANAN
KEOTIAXP	ITTC	IA	KEOKUK
LAMTIA XO	ITTC	IA	BUCHANAN
LOGNIA XO	ITTC	IA	HARRISON
LTSXIA XO	ITTC	IA	HARRISON
MGNLIA XP	ITTC	IA	HARRISON
MNDMIA XO	ITTC	IA	HARRISON
MODLIA XO	ITTC	IA	HARRISON
MRNGIA XO	ITTC	IA	IOWA
ORNTIAXP	ITTC	IA	ADAIR
PERSIAXP	ITTC	IA	HARRISON
PRCVIA XO	ITTC	IA	FREMONT
PRSCIAXO	ITTC	IA	ADAMS
PSGHIA XO	ITTC	IA	HARRISON
RNBCIA XO	ITTC	IA	GRUNDY
RNDHIA XO	ITTC	IA	FREMONT
RPPYIA XO	ITTC	IA	GREENE
RVTNIA XP	ITTC	IA	FREMONT
SDNYIAXP	ITTC	IA	FREMONT
SGRNIA XP	ITTC	IA	KEOKUK
TABRIAXO	ITTC	IA	FREMONT
THRMIA XP	ITTC	IA	FREMONT

Exhibit A

List of Non-Competitive Exchanges and Counties FCC #6

Wire Center	COSA	State	County
WDBIAXO	ITTC	IA	HARRISON
WHCHIA XO	ITTC	IA	KEOKUK
WLBGIA XO	ITTC	IA	IOWA
ADARIA XO	ITTC	IA	ADAIR
APTNIAXO	ITTC	IA	BUTLER
BLLVIA XO	ITTC	IA	JACKSON
BRWRIA XO	ITTC	IA	ADAIR
BYRDIAXO	ITTC	IA	GUTHRIE
FNTLIA XO	ITTC	IA	ADAIR
GNCTIA XO	ITTC	IA	GRUNDY
GNFDIA XO	ITTC	IA	ADAIR
GRNEIA XO	ITTC	IA	BUTLER
GTCTIA XO	ITTC	IA	GUTHRIE
MDRDIAXO	ITTC	IA	BOONE
SABLIA XP	ITTC	IA	JACKSON
WSBGIA XO	ITTC	IA	GRUNDY
ATTCIA XO	ITTC	IA	MARION
BGLYIA XO	ITTC	IA	GUTHRIE
BNTNIA XP	ITTC	IA	RINGGOLD
BRNDIA XO	ITTC	IA	BUCHANAN
BSSYIA XO	ITTC	IA	MARION
DGNLIA XO	ITTC	IA	RINGGOLD
DODSIA XO	ITTC	IA	VAN BUREN
FRTNIA XO	ITTC	IA	VAN BUREN
HDRCIA XO	ITTC	IA	KEOKUK
HSTNIA XO	ITTC	IA	WAYNE
JAMCIA XO	ITTC	IA	GUTHRIE
KLTNIA XO	ITTC	IA	RINGGOLD
KNVLIAXC	ITTC	IA	MARION
MLCHIA XO	ITTC	IA	MARION
MLTNIA XO	ITTC	IA	VAN BUREN
MRBGIA XO	ITTC	IA	KEOKUK
MTAYIAXC	ITTC	IA	RINGGOLD
OLLIAXO	ITTC	IA	KEOKUK
OTLYIA XO	ITTC	IA	MARION
PELLIA XO	ITTC	IA	MARION
PMCYIA XO	ITTC	IA	WAYNE
PSVLIAXO	ITTC	IA	MARION
RCLDIA XO	ITTC	IA	KEOKUK

Exhibit A

List of Non-Competitive Exchanges and Counties FCC #6

Wire Center	COSA	State	County
RDNGIAXO	ITTC	IA	RINGGOLD
RWLYIAXO	ITTC	IA	BUCHANAN
SYMRIAXO	ITTC	IA	WAYNE
TNGLIAXO	ITTC	IA	RINGGOLD
TRACIAXO	ITTC	IA	MARION
AGSTKYXA	COKY	KY	BRACKEN
ARTNKYXA	COKY	KY	CARLISLE
BBVLKYXA	COKY	KY	KNOX
BKVLKYXA	COKY	KY	BRACKEN
BRHDKYXA	COKY	KY	ROCKCASTLE
BRWLKYXA	COKY	KY	CARLISLE
BWVLKYXA	COKY	KY	EDMONSON
CKSNKYXA	COKY	KY	GRAYSON
CLMBKYXA	COKY	KY	HICKMAN
CMLDKYXA	COKY	KY	HARLAN
CYVLKYXA	COKY	KY	GRAYSON
DOVRKYXA	COKY	KY	MASON
EBNKKYXA	COKY	KY	PULASKI
EBRNKYAC	COKY	KY	LAUREL
EVRSKYXA	COKY	KY	HARLAN
FBSHKYXA	COKY	KY	PULASKI
FLLCKYXA	COKY	KY	KNOX
FRNLKYXA	COKY	KY	MASON
GMTWKYXA	COKY	KY	BRACKEN
IRVNKYXA	COKY	KY	ESTILL
JHVLKYXA	COKY	KY	BRACKEN
LONDKYXA	COKY	KY	LAUREL
LVTNKYXA	COKY	KY	ROCKCASTLE
LWGMKYXA	COKY	KY	LOGAN
MLBNKYXA	COKY	KY	CARLISLE
MMCVKYXA	COKY	KY	EDMONSON
MTOLKYXA	COKY	KY	ROBERTSON
MTVRKYAI	COKY	KY	ROCKCASTLE
MYLCKYXA	COKY	KY	MASON
SCHLKYXA	COKY	KY	PULASKI
SMLDKYXA	COKY	KY	LIVINGSTON
SOVLKYXA	COKY	KY	PULASKI
UNTWKYXA	COKY	KY	UNION
WASHKYXA	COKY	KY	MASON

Exhibit A

List of Non-Competitive Exchanges and Counties FCC #6

Wire Center	COSA	State	County
WHLLKYXA	COKY	KY	PULASKI
BRSDKYXA	GTKY	KY	PULASKI
BTVLKYXA	GTKY	KY	GARRARD
CMVLKYXA	GTKY	KY	TAYLOR
GNBGKYXB	GTKY	KY	GREEN
GRSNKYXA	GTKY	KY	LEWIS
HGVLKYXA	GTKY	KY	LARUE
HTVLKYXE	GTKY	KY	LINCOLN
LBRTKYXA	GTKY	KY	CASEY
LNCSKYXA	GTKY	KY	GARRARD
LTFDKYXA	GTKY	KY	GRAYSON
MNTIKYXA	GTKY	KY	WAYNE
NANCKYXA	GTKY	KY	PULASKI
SCVLKYXA	GTKY	KY	ALLEN
SMRTKYXA	GTKY	KY	PULASKI
TLBOKYXA	GTKY	KY	LEWIS
VNBGKYXA	GTKY	KY	LEWIS
ALDLMOXA	WSMO	MO	WORTH
ALDRMOXA	WSMO	MO	POLK
BLFLMOXA	WSMO	MO	MONTGOMERY
BLVRMOXA	WSMO	MO	POLK
CLUBMOXX	WSMO	MO	WAYNE
CRCRMOXA	WSMO	MO	PULASKI
DIXNMOXA	WSMO	MO	PULASKI
DNPHEMOXX	WSMO	MO	RIPLEY
EOLIMOX	WSMO	MO	PIKE
FLRNMOXA	WSMO	MO	MORGAN
FRDLMOXA	WSMO	MO	RIPLEY
FRPLMOXA	WSMO	MO	POLK
GDINMOXA	WSMO	MO	CARTER
GNVLEMOXX	WSMO	MO	WAYNE
GTCYMOXA	WSMO	MO	WORTH
HLWYMOXA	WSMO	MO	POLK
LBRLMOXA	WSMO	MO	BARTON
LCLDMOX	WSMO	MO	LINN
MDNMMOX	WSMO	MO	BARTON
MDTWMOX	WSMO	MO	MONTGOMERY
MNDNMOXX	WSMO	MO	CHARITON
MRVLEMOXA	WSMO	MO	POLK

Exhibit A

List of Non-Competitive Exchanges and Counties FCC #6

Wire Center	COSA	State	County
MYRTMOXA	WSMO	MO	OREGON
NHFRMOXA	WSMO	MO	PIKE
NLVLMOXA	WSMO	MO	BUTLER
NYLRMOXX	WSMO	MO	RIPLEY
OXLYMOXA	WSMO	MO	RIPLEY
PASNMOXX	WSMO	MO	WAYNE
PDMTMOXX	WSMO	MO	WAYNE
PLHPMOXA	WSMO	MO	POLK
PNDRMOXA	WSMO	MO	RIPLEY
POLKMOXA	WSMO	MO	POLK
RTVLMOXX	WSMO	MO	CHARITON
SKTNMOXA	WSMO	MO	CEDAR
SMNRMOXA	WSMO	MO	CHARITON
SOCYMOXA	WSMO	MO	LAWRENCE
STVRMOXA	WSMO	MO	MORGAN
VRNAMOX	WSMO	MO	LAWRENCE
WPPLMOXX	WSMO	MO	WAYNE
WSVLMOXA	WSMO	MO	WAYNE
AVOCNEXL	LTNE	NE	CASS
BLWDNEXL	LTNE	NE	BUTLER
BRNRNEXL	LTNE	NE	BUTLER
BRUNNEXL	LTNE	NE	BUTLER
CLCTNEXL	LTNE	NE	CLAY
DEWSNEXL	LTNE	NE	CLAY
DVCYNEXL	LTNE	NE	BUTLER
DWGHNEXL	LTNE	NE	BUTLER
EAGLNEXL	LTNE	NE	CASS
EDGRNEXL	LTNE	NE	CLAY
EMWDNEXL	LTNE	NE	CASS
FRFDNEXL	LTNE	NE	CLAY
GDRKNEXL	LTNE	NE	WEBSTER
GLNVNEXL	LTNE	NE	CLAY
GNWDNEXL	LTNE	NE	CASS
HRDYNEXL	LTNE	NE	NUCKOLLS
HRVRNEXL	LTNE	NE	CLAY
LSVLNEXL	LTNE	NE	CASS
MRDCNEXL	LTNE	NE	CASS
MRRYNEXL	LTNE	NE	CASS
NHWKNEXL	LTNE	NE	CASS

Exhibit A

List of Non-Competitive Exchanges and Counties FCC #6

Wire Center	COSA	State	County
NLSNNEXL	LTNE	NE	NUCKOLLS
OCTVNEXL	LTNE	NE	BUTLER
ONG NEXL	LTNE	NE	CLAY
OSCLNEXL	LTNE	NE	POLK
PLTSNEXL	LTNE	NE	CASS
POLKNEXL	LTNE	NE	POLK
RSCYNEXL	LTNE	NE	BUTLER
RSKNNEXL	LTNE	NE	NUCKOLLS
SHLBNEXL	LTNE	NE	POLK
SPRRNEXL	LTNE	NE	NUCKOLLS
SRPSNEXL	LTNE	NE	BUTLER
STBGNEXL	LTNE	NE	POLK
STTNEXL	LTNE	NE	CLAY
UNINNEXL	LTNE	NE	CASS
WPWRNEXL	LTNE	NE	CASS
HLBONMXC	VANN	NM	SIERRA
OJCLNMXC	VANN	NM	TAOS
TRCNNMXB	VANN	NM	SIERRA
TRCNNMXC	VANN	NM	SIERRA
VLCTNMXC	VANN	NM	SIERRA
BLDLOHXA	ALWR	OH	JEFFERSON
CHESOHXA	ALWR	OH	MEIGS
CNTBOHXA	ALWR	OH	BELMONT
FRVWOHXA	ALWR	OH	BELMONT
HPDLOHXA	ALWR	OH	HARRISON
MRTWOHXA	ALWR	OH	BELMONT
PWPNOHXA	ALWR	OH	BELMONT
RDVLOHXA	ALWR	OH	MEIGS
AVNTOKXC	VAOK	OK	OSAGE
BRNSOKXA	VAOK	OK	OSAGE
BYTNOKXB	VAOK	OK	MUSKOGEE
CHTHOKXD	VAOK	OK	MCINTOSH
FRFXOKXA	VAOK	OK	OSAGE
HMNYOKXB	VAOK	OK	OSAGE
HSKLOKXA	VAOK	OK	MUSKOGEE
KWCYOKXA	VAOK	OK	KAY
LNSDOKXA	VAOK	OK	GARVIN
MRRSOKXC	VAOK	OK	OKMULGEE
MYVLOKXA	VAOK	OK	GARVIN

Exhibit A

List of Non-Competitive Exchanges and Counties FCC #6

Wire Center	COSA	State	County
PRCLOKXA	VAOK	OK	MCCLAIN
WASHOKXA	VAOK	OK	MCCLAIN
WAYNOKXA	VAOK	OK	MCCLAIN
ASLDOKXA	WSOP	OK	PITTSBURG
BTSTOKXA	WSOP	OK	MCCURTAIN
CLRTOKXA	WSOP	OK	COAL
CNVLOKXA	WSOP	OK	JOHNSTON
ELCYOKXA	WSOP	OK	GARVIN
ELCYOKXB	WSOP	OK	GARVIN
GOTBOKXA	WSOP	OK	KIOWA
GRTYOKXA	WSOP	OK	HUGHES
HMMNOKXA	WSOP	OK	ROGER MILLS
KIOWOKXA	WSOP	OK	PITTSBURG
MLBNOKXA	WSOP	OK	JOHNSTON
MLCKOKXA	WSOP	OK	JOHNSTON
MTVWOKXA	WSOP	OK	KIOWA
PKCYOKXA	WSOP	OK	CARTER
RSVTOKXA	WSOP	OK	KIOWA
RTCYOKXA	WSOP	OK	CARTER
SMVLOKXA	WSOP	OK	MCCURTAIN
SNYDOKXA	WSOP	OK	KIOWA
STTWOKXA	WSOP	OK	ATOKA
SVNNOKXA	WSOP	OK	PITTSBURG
VELMOKXA	WSOP	OK	STEPHENS
WRDVOKXA	WSOP	OK	ATOKA
BARNOKXA	WSOP	OK	ADAIR
CMRNOKXA	WSOP	OK	LE FLORE
HVNROKXA	WSOP	OK	LE FLORE
MOHOOKXA	WSOP	OK	LE FLORE
POTEOKXA	WSOP	OK	LE FLORE
STWLOKXA	WSOP	OK	ADAIR
VIANOKXA	WSOP	OK	SEQUOYAH
WSTROKXA	WSOP	OK	LE FLORE
APLLPAXA	ALPA	PA	ARMSTRONG
BBTWPAXB	ALPA	PA	GREENE
BCWYPAXB	ALPA	PA	JEFFERSON
BKVLPAxB	ALPA	PA	JEFFERSON
BRVEPAXB	ALPA	PA	GREENE
CRMCPAXC	ALPA	PA	GREENE

Exhibit A

List of Non-Competitive Exchanges and Counties FCC #6

Wire Center	COSA	State	County
CRSCPAXC	ALPA	PA	JEFFERSON
DAYTPAXD	ALPA	PA	ARMSTRONG
ELDRPAXE	ALPA	PA	ARMSTRONG
FDCYPAXF	ALPA	PA	ARMSTRONG
GNBOPAXG	ALPA	PA	GREENE
GYVLPAXG	ALPA	PA	GREENE
HAZNPAXH	ALPA	PA	JEFFERSON
JFSNPAXJ	ALPA	PA	GREENE
KTNGPAXK	ALPA	PA	ARMSTRONG
LCBGPAXL	ALPA	PA	ARMSTRONG
LNSVPAXL	ALPA	PA	WAYNE
MTMRPAXM	ALPA	PA	GREENE
NWFPPAXN	ALPA	PA	GREENE
RKLDPAXR	ALPA	PA	VENANGO
RRVLPAXR	ALPA	PA	GREENE
RRVYPAXR	ALPA	PA	ARMSTRONG
SIGLPAXS	ALPA	PA	JEFFERSON
SPGGPAXS	ALPA	PA	GREENE
SUVLPAXS	ALPA	PA	JEFFERSON
TMBLPAXT	ALPA	PA	JEFFERSON
TMTNPAXT	ALPA	PA	ARMSTRONG
TUVPAXT	ALPA	PA	NORTHUMBERLAND
WOTNPAXW	ALPA	PA	ARMSTRONG
WTTWPAXW	ALPA	PA	NORTHUMBERLAND
WYBGPAXW	ALPA	PA	GREENE
CMRNSCXA	WSSC	SC	CALHOUN
STMTSCXA	WSSC	SC	CALHOUN
ABRNTXXA	VATX	TX	HALE
AMHRTXXA	VATX	TX	LAMB
ANNNTXXA	VATX	TX	RED RIVER
AVNGTXXA	VATX	TX	CASS
BKVLTXXA	VATX	TX	PANOLA
BLGVTXXA	VATX	TX	NAVARRO
BLWLTXXA	VATX	TX	NOLAN
BNJMTXXA	VATX	TX	KNOX
BOKRTXXA	VATX	TX	LIPSCOMB
BOVNTXXA	VATX	TX	PARMER
BWFDTXXA	VATX	TX	TERRY
BYNMTXXA	VATX	TX	HILL

Exhibit A

List of Non-Competitive Exchanges and Counties FCC #6

Wire Center	COSA	State	County
CLADTXXB	VATX	TX	ARMSTRONG
CLDNTXXA	VATX	TX	DONLEY
CLVLTXXA	VATX	TX	RED RIVER
DDSNTXXA	VATX	TX	COLLINGSWORTH
DGVLTXXA	VATX	TX	CASS
DKLBTXXA	VATX	TX	BOWIE
DNCYTXXA	VATX	TX	YOAKUM
DNFDTXXA	VATX	TX	MORRIS
DRZTTXXB	VATX	TX	LIPSCOMB
DWSNTXXA	VATX	TX	NAVARRO
ESTLTXXA	VATX	TX	HALL
FLLTXXA	VATX	TX	LIPSCOMB
FRINTXXA	VATX	TX	PARMER
FRSATXXA	VATX	TX	HOWARD
FRSTTXXA	VATX	TX	NAVARRO
GROMTXXA	VATX	TX	CARSON
GVTNTXXA	VATX	TX	TRINITY
HBRDTXXA	VATX	TX	HILL
HDLYTXXA	VATX	TX	DONLEY
HGNSTXXA	VATX	TX	LIPSCOMB
HGSPTXXA	VATX	TX	CASS
HPPYTXXA	VATX	TX	SWISHER
KNCYTXXA	VATX	TX	KNOX
LAMSTXXA	VATX	TX	DAWSON
LKVWTXXA	VATX	TX	HALL
LNDNTXXA	VATX	TX	CASS
LNSTTXXA	VATX	TX	MORRIS
LTFDTXXA	VATX	TX	LAMB
MALNTXXA	VATX	TX	HILL
MBTETXXA	VATX	TX	WHEELER
MEDWTXXA	VATX	TX	TERRY
MIAMTXXA	VATX	TX	ROBERTS
MMPHTXXA	VATX	TX	HALL
MNDYTXXA	VATX	TX	KNOX
MRTTTXXA	VATX	TX	CASS
MTCLTXXA	VATX	TX	HILL
NBTNTXXB	VATX	TX	BOWIE
NPLSTXXA	VATX	TX	MORRIS
PNHDTXXA	VATX	TX	CARSON

Exhibit A

List of Non-Competitive Exchanges and Counties FCC #6

Wire Center	COSA	State	County
POSTXXA	VATX	TX	GARZA
PTBGTXA	VATX	TX	HALE
PYTNTXA	VATX	TX	OCHILTREE
SPDETXA	VATX	TX	LAMB
SPMNTXA	VATX	TX	HANSFORD
THRKTXA	VATX	TX	THROCKMORTON
TRNYTXA	VATX	TX	TRINITY
TXRKTXA	VATX	TX	BOWIE
TXRKTXB	VATX	TX	BOWIE
WGTNTXA	VATX	TX	COLLINGSWORTH
WHDRTXA	VATX	TX	CARSON
WHLRTXA	VATX	TX	WHEELER
ADRNTXA	VCTX	TX	OLDHAM
ANDRTXA	VCTX	TX	ANDREWS
ATONTXA	VCTX	TX	HOUSTON
AVRYTXA	VCTX	TX	RED RIVER
BAWLTXA	VCTX	TX	RED RIVER
BEDSTXA	VCTX	TX	GRIMES
BFLOTXA	VCTX	TX	LEON
BLMRTXA	VCTX	TX	REEVES
BNWRTXA	VCTX	TX	NEWTON
BOGTTXA	VCTX	TX	RED RIVER
BRDDTXA	VCTX	TX	SAN AUGUSTINE
BRSTNTXA	VCTX	TX	SABINE
BRVLTXA	VCTX	TX	NEWTON
BURLTXA	VCTX	TX	MILAM
BYRNTXA	VCTX	TX	OLDHAM
CCTSTXA	VCTX	TX	MOORE
CITNTXA	VCTX	TX	FALLS
CLMSTXA	VCTX	TX	TYLER
CNVLTXA	VCTX	TX	LEON
CRCTTXA	VCTX	TX	HOUSTON
CSNGTXA	VCTX	TX	NACOGDOCHES
CYNSTXA	VCTX	TX	PECOS
DTRTTXA	VCTX	TX	RED RIVER
DUMSTXA	VCTX	TX	MOORE
EKHTTXA	VCTX	TX	ANDERSON
FAMTTXA	VCTX	TX	SABINE
FKLNTXA	VCTX	TX	ROBERTSON

Exhibit A

List of Non-Competitive Exchanges and Counties FCC #6

Wire Center	COSA	State	County
FRCYTXA	VCTX	TX	ANDREWS
FRFDTXB	VCTX	TX	FREESTONE
FRTCTXA	VCTX	TX	HUTCHINSON
FTHNTXC	VCTX	TX	HUDSPETH
GARYTXB	VCTX	TX	PANOLA
GPLDTXA	VCTX	TX	HOUSTON
HMHLTXA	VCTX	TX	SABINE
HNTNTXA	VCTX	TX	ANGELINA
HOKSTXA	VCTX	TX	BOWIE
HTLKTXA	VCTX	TX	LEON
IMPRTXA	VCTX	TX	PECOS
IOLATXA	VCTX	TX	GRIMES
IRENTXA	VCTX	TX	HILL
JOQNTXA	VCTX	TX	SHELBY
KNRDTXA	VCTX	TX	HOUSTON
LOLDTXA	VCTX	TX	HOUSTON
LONATXA	VCTX	TX	LEON
LORNTXA	VCTX	TX	MITCHELL
LOTTTXA	VCTX	TX	FALLS
MAUDTXA	VCTX	TX	BOWIE
MLAMTXA	VCTX	TX	HILL
MNTNTXA	VCTX	TX	LOVING
MORNTXA	VCTX	TX	SHACKELFORD
MRGNTXA	VCTX	TX	BOSQUE
MRQZTXA	VCTX	TX	LEON
NGLYTXA	VCTX	TX	RED RIVER
NRMNTXA	VCTX	TX	LEON
NWTNTXA	VCTX	TX	NEWTON
NZLHTXA	VCTX	TX	MADISON
OKWDTXA	VCTX	TX	LEON
ORLATXA	VCTX	TX	REEVES
PECSTXA	VCTX	TX	REEVES
PECSTXB	VCTX	TX	REEVES
PNLDTXA	VCTX	TX	SABINE
PNTNTXA	VCTX	TX	TRINITY
PRDNTXA	VCTX	TX	NAVARRO
RCLDTXA	VCTX	TX	NAVARRO
RDWRTXA	VCTX	TX	BOWIE
RKLWTXA	VCTX	TX	CHEROKEE

Exhibit A

List of Non-Competitive Exchanges and Counties FCC #6

Wire Center	COSA	State	County
RSBDTXXA	VCTX	TX	FALLS
RSSTTXXA	VCTX	TX	EASTLAND
SLCMTXXA	VCTX	TX	ANDERSON
SMMSTXXA	VCTX	TX	BOWIE
SNFRTXXA	VCTX	TX	HUTCHINSON
SNRYTXXA	VCTX	TX	MOORE
SRBLTXXA	VCTX	TX	HUDSPETH
STMNTXXA	VCTX	TX	FREESTONE
TLIATXXA	VCTX	TX	SWISHER
TNHATXXA	VCTX	TX	SHELBY
TOYHTXXA	VCTX	TX	REEVES
VEGATXXA	VCTX	TX	OLDHAM
VHRNTXXA	VCTX	TX	CULBERSON
VLNTTXXA	VCTX	TX	JEFF DAVIS
WHTYTXXA	VCTX	TX	HILL
WLDRTXXA	VCTX	TX	OLDHAM
WNSPTXXA	VCTX	TX	BOSQUE
ZVLATXXA	VCTX	TX	ANGELINA
BNHRTXXA	WSSL	TX	LIMESTONE
CLDGTXXA	WSSL	TX	LIMESTONE
GRSNTXXA	WSSL	TX	NACOGDOCHES
PRHLTXXA	WSSL	TX	LIMESTONE
SNDYTXXA	WSSL	TX	LIMESTONE
THCNTXXA	WSSL	TX	LIMESTONE
WTWDTXXA	WSSL	TX	SAN JACINTO
ANHCTXXA	WSTX	TX	CHAMBERS
BLUMTXXA	WSTX	TX	HILL
BONTTXXA	WSTX	TX	MONTAGUE
BRNDTXXA	WSTX	TX	HILL
CVTNTXXA	WSTX	TX	HILL
DBBYTXXA	WSTX	TX	CHAMBERS
HNKMTXXA	WSTX	TX	CHAMBERS
IRDLTXXA	WSTX	TX	BOSQUE
KPRLTXXA	WSTX	TX	BOSQUE
LKVGTXA	WSTX	TX	BOSQUE
MOSHTXXA	WSTX	TX	BOSQUE
MTAGTXXA	WSTX	TX	MONTAGUE
NCNATXXA	WSTX	TX	MONTAGUE
PLNSTXXA	WSTX	TX	YOAKUM

Exhibit A

List of Non-Competitive Exchanges and Counties FCC #6

Wire Center	COSA	State	County
RNGLTXXA	WSTX	TX	MONTAGUE
SPFTTXXA	WSTX	TX	MONTAGUE
VLMLTXXA	WSTX	TX	BOSQUE
WLVLTXXA	WSTX	TX	CHAMBERS
WNNETXXA	WSTX	TX	CHAMBERS

Exhibit B

List of Non-Competitive Exchanges and Counties FCC #7

Wire Center	COSA	State	County
BLKLGAXA	WSGT	GA	EARLY
CDSPGAXA	WSGT	GA	EARLY
GRDNGAXA	WSAC	GA	WILKINSON
IRTNGAXA	WSAC	GA	WILKINSON
TMBOGAXA	WSAC	GA	WILKINSON