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 submits this filing in support of 2018 Mid-Year Access Charge Tariff Filing to implement required exogenous cost adjustments to reflect changes in the Telecommunications Relay Service ("TRS") carrier contribution factor, the North American Numbering Plan Administration ("NANPA") contribution factor, and the annual regulatory fee for Interstate Telecommunications Service Providers ("ITSP"). This filing is being made on at least 16 days' notice, as required by Section 61.58(a)(2)(ii) of the Federal Communications Commission ("Commission") Rules in Part 47 of the Code of Federal Regulations ("C.F.R."), 47 C.F.R. § 61.58(a)(2)(ii) (2017).

This filing is being made in compliance with the following:

- Second Report and Order, *In the Matter of Policy and Rules Concerning Rates for Dominant Carriers*, CC Docket No. 87-313, Released October 4, 1990;
- Order on Reconsideration, *In the Matter of Policy and Rules Concerning Rates for Dominant Carriers*, CC Docket No. 87-313, Released April 17, 1991;
- First Report and Order, *In the Matter of Price Cap Performance Review for Local Exchange Carriers,* CC Docket No. 94-1, Released April 7, 1995;

- Report and Order, *In the Matter of Price Cap Regulation of Local Exchange Carriers, Rate-of-Return Sharing and Lower Formula Adjustment,* CC Docket No. 93-179, Released April 14, 1995;
- Fourth Report and Order, *In the Matter of Price Cap Performance Review for Local Exchange Carriers,* CC Docket No. 94-1, Released May 21, 1997;
- First Report and Order, *In the Matter of Access Charge Reform,* CC Docket No. 96-262, Released May 16, 1997;
- Second Order on Reconsideration and Memorandum Opinion and Order, *In the Matter of Access Charge Reform,* CC Docket No. 96-262, Released October 9, 1997;
- Third Report and Order, *In the Matter of Access Charge Reform,* CC Docket No. 96-262, Released November 26, 1997;
- Report and Order & Further Notice of Proposed Rulemaking*, In the Matter of Defining Primary Lines*, CC Docket No. 97-181, Released March 10, 1999;
- Public Notice, DA 99-584, Released March 25, 1999;
- Public Notice, DA99-1091, released June 4, 1999;
- Sixth Report and Order, *In the Matter of Access Charge Reform*, CC Docket 92-262, Released May 31, 2000 (CALLS);
- 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);
- And in accordance with Commission Rules in 47 C.F.R. § 61.38 and § 61.41 through § 61.49;

Herein referred to collectively as the "Price Cap Rules";

- And with Commission Rules in 47 C.F.R., Part 61, generally.
- Report and Order and Further Notice of Proposed Rulemaking FCC 11-61, WC Docket 10-90, GN Docket 09-51, WC Docket 07-135, WC Docket 05-337, CC Docket 01-92, CC Docket 96-45, WC Docket 03-109, WT Docket 10-208, released November 18, 2011.

Herein referred to as the "USF/ICC Transformation Order".

In addition, this filing revised Windstream's tariffs to reflect the change in the Federal Universal Service Fund Contribution Factor for the 4th Quarter of 2018.

B. 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 Regulation and for Limited Waiver Relief,* WC Docket No. 12-63, Released December 13, 2012.

II. Index and Rate Development

A. Existing Indices

The existing indices are those indices that will be in effect on September 30, 2018. See IND-REF for transmittal numbers under which existing indices became effective.

B. Exogenous Costs

Windstream developed exogenous cost changes according to the Price Cap Rules. These dollar effects were measured at the 2017 base period level of operations and apportioned on a cost-causative basis between price cap and non-price services and then among the price cap baskets. To apportion exogenous costs changes between those Special Access services that remain subject to price cap regulation and those Special Access services that are de-tariffed as a result of the Business Data Services (BDS) Order, a ratio of the revenues of Special Access services that continue to be subject to price cap regulation to total Special Access revenues prior to the BDS Order was developed. This ratio was applied to allocate total exogenous costs between tariffed and de-tariffed Special Access services. Exogenous cost changes and allocations are shown in Exhibit EXG.

For each allowed exogenous cost, the Exogenous Cost adjustment ("EXG_Cost [Adj]") is equal to the change in the current Price Cap Exogenous Cost ("EXG_Cost [t-1]") less the Exogenous Cost already reflected in the Price Cap indices ("EXG_Cost [t-2]").

$$EXG\_Cost_{Adj} = EXG\_Cost_{t-1} - EXG\_Cost_{t-2}$$

The current Price Cap Exogenous Cost is calculated by multiplying current year's 499A Total Revenue ("499A_Total_Rev [t-1]") by the current Exogenous Cost Factor ("Exg_Factor [t-1]") adjusted by the ratio of the current year's 499A Price Cap Revenue ("499A_PriceCap_Rev [t-1]") to the current year's 499A Total Revenue ("499A_Total_Rev [t-1]"). This formula simplifies to the current Exogenous Cost Factor multiplied by the current year's 499A Price Cap Revenue.

$$\begin{aligned} EXG_{Cost\,t-1} &= (499A\_Total\_Rev_{t-1} * EXG\_Factor_{t-1}) * \frac{499A\_PriceCap\_Rev_{t-1}}{499A\_Total\_Rev_{t-1}} \\ \rightarrow &= EXG\_Rate_{t-1} * IS\_PriceCap\_Rev_{t-1} \end{aligned}$$

The level of exogenous cost already reflected in the Price Cap indices is calculated by multiplying the previous year's 499A Total Revenue ("499A_Total_Rev [t-2]") by the exogenous cost factor included in the price cap indices ("Exg_Factor [t-2]"). This result is then multiplied by the ratio of the previous year's 499A Price Cap Revenue ("499A_PriceCap_Rev [t-2]") to the previous year's 499A Total Revenue ("499A_Total_Rev [t-2]"). The result is lastly multiplied by the ratio of the current year's 499A Price Cap revenue ("499A_PriceCap_Rev [t-1]") to the previous year's 499A Price Cap revenue ("499A_PriceCap_Rev [t-2]"). This formula simplifies to the exogenous cost factor included in the price cap indices multiplied by the current year's 499A Price Cap revenue.

$$\begin{aligned} EXG\_Cost_{t-2} &= (499A\_Total\_Rev_{t-2} * EXG\_Factor_{t-2}) * \frac{499A\_PriceCap\_Rev_{t-2}}{499A\_Total\_Rev_{t-2}} * \frac{499A\_PriceCap\_Rev_{t-1}}{499A\_PriceCap\_Rev_{t-2}} \\ \rightarrow &= (IS\_499A\_Rev_{t-2} * EXG\_Rate_{t-2}) * \frac{IS\_PriceCap\_Rev_{t-1}}{IS\_499A\_Rev_{t-2}} \\ \rightarrow &= EXG\_Rate_{t-2} * IS\_PriceCap\_Rev_{t-1} \end{aligned}$$

Thus, the Exogenous Cost adjustment is equal to the current Exogenous Cost Factor ("EXG_Factor [t-1]") multiplied by the current year's 499A Price Cap revenues ("499A_PriceCap_Rev [t-1]") less the Exogenous Cost factor already in the Price Cap indices ("EXG_Factor [t-2]") multiplied by the current year's 499A Price Cap revenue ("499A_PriceCap_Rev [t-1]"). This simplifies to the change in the Exogenous Cost factor, i.e. the current Exogenous Cost factor less the Exogenous Cost factor already in the Price Cap indices, multiplied by the current year's 499A Price Cap revenue.

$$EXG\_Cost_{Adj} = (EXG\_Factor_{t-1} * 499A\_PriceCap\_Rev_{t-1}) - (EXG\_Factor_{t-2} * 499A\_PriceCap\_Rev_{t-1})$$
$$\rightarrow \quad = (EXG\_Factor_{t-1} - EXG\_Factor_{t-2}) * 499A\_PriceCap\_Rev_{t-1}$$

a) Regulatory Fees

Local Exchange Companies ("LECs") are allowed to recover the impact of regulatory fees as an exogenous cost. The calculations of the regulatory fees to be paid in the 2018 tariff year are based on the factor of 0.00291 as referenced in *Appendix B of the Assessment and Collection of Regulatory Fees for Fiscal Year 2018*, MD Docket No. 18-175, Report and Order and Order, FCC 18-126, released August 29, 2018.

b) Telecommunications Relay Service

In its Third Report and Order in CC Docket No. 90-571, the Commission required that all common carriers providing interstate telecommunications services contribute to an interstate shared fund to support the TRS function. The TRS exogenous cost reflects changes from funding contributions reflected in the last annual filing allowing Windstream to calculate the current TRS exogenous costs for this tariff period's contribution. For the 2018 tariff year, the fee will be based on the factor of 0.02801 as set forth in *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket Nos. 03-123 & 10-51, Order, DA 18-680, released June 29, 2018.

c) North American Numbering Plan Fee

In the North American Numbering Plan Administration ("NANPA") Order, the Commission required all telecommunications carriers to contribute to the cost recovery for numbering administration. To remain consistent in the price cap treatment of such fees, i.e., Regulatory Fee and Telecommunications Relay Services Fee, the NANPA fee is treated as an exogenous change. For the 2018 tariff year, the fee will be based on the factor of 0.0000427 as set forth in Public Notice, "Wireline Competition Bureau Announces the Proposed North American Numbering Plan Administration Fund Size Estimate and Contribution Factor for October 2018 through September 2019," CC Docket No. 92-237, DA 18-727, released July 13, 2018.

C. CMT Per Line Revenue

Part 61.3(d) of the Commission's Rules discusses the calculation of the maximum SLC for the residential and single-line business, non-primary residential and multi-line business service categories based on the average common line, marketing and transport interconnection charge revenues (CMT revenue) per line. Exhibit CMT displays the current CMT per line rate for Windstream and calculates the adjusted CMT per line rate based upon 2017 access lines.

D. Excluded Services

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

III. USF/ICC Order

A. Access Reduction Spreadsheet

In compliance with the FCC's USF/ICC Transformation Order, Windstream is including Access Reduction Workbooks for WTS Tariff F.C.C. Nos. 6 and 7. To implement the Transitional Intrastate Access Service reductions required by 47 C.F.R. §51.907, Windstream prepared the "ICC-Access Reduction" templates released by the Federal Communications Commission ("FCC") on April 25, 2018, for calculating the July 3, 2018 intrastate access rate changes and eligible recovery.

The FCC spreadsheet template provides the methodology for calculating the rate reductions and identifies in detail the intrastate access rates that are required to be reduced consistent with the rules. The access rates to be reduced are referred to by the FCC as "Transitional Intrastate Access Service" and defined to include rates within the following categories:

- Terminating End Office Access Service
- Tandem Switched Transport Access Service

Sections 51.907(b)-(h) of the FCC Rules sets forth the specific steps to calculate the rates for Transitional Intrastate Access Service to be effective July 3, 2018. The required rate reductions are taken to meet reduction obligations and the eligible recovery amount is determined. These models have been filed along with tariff changes in compliance with the applicable state regulations.

Redacted and non-redacted versions of the template workbooks are included with this filing.

1. Terminating Interstate End Office Switched and Tandem-Switched Transport Access Revenues

Windstream calculated Terminating Interstate End Office Switched and Tandem-Switched Transport Access Revenues based on the methodology set forth in the Access Reduction TRP approved by the FCC. Windstream obtained the billed demand for terminating interstate end office switched and tandem-switched transport access services during the period of October 2010 through September 2011 (“FY11”).

2. Access Service Revenues

Transitional Intrastate Access Service Revenues. Windstream calculated transitional intrastate access service revenues using the Access Reduction Template released by the Commission on April 25, 2018 and consistent with Section 51.907(b)(2) and (c) of the Commission’s Rules, 47 C.F.R. § 51.907(b) and (c). Windstream obtained the billed demand for transitional intrastate access services during the period of October 2010 through September 2011 (“FY11”).

Interstate Composite Terminating End Office Access Revenues. Windstream determined its Interstate Composite Terminating End Office Access Revenues based on the methodology set forth in the Access Reduction Template released by the Commission on April 25, 2018 and consistent with Section 51.907(g) of the Commission’s Rules, 47 C.F.R. § 51.907(d)-(f). See generally Material to be Filed in Support of 2018 Annual Access Tariff Filings, WC Docket No. 18-100, Order, DA 18-404, (Wireline Competition Bur., rel. April 25, 2018)(“TRP Order”). The FCC template provides the methodology for calculating the rate reductions and identifies in detail the interstate access rates that are required to be reduced consistent with FCC’s Rules. Step 7 of the USF-ICC Transformation Order, as set forth in Section 51.907(h), adjusts the Interstate Composite Terminating End Office Access rate down to a bill-and-keep methodology. Once Windstream adjusted the individual interstate end office access rates, compliance was tested to ensure the July 3, 2018 rates allowed for no higher than a Composite Terminating End Office Access Rate of $0.0000.

Interstate Tandem-Switched Transport Access Service. Windstream determined its Tandem-Switched Transport Access Service Revenues based on the methodology set forth in the Access Reduction Template released by the Commission on April 25, 2018, and consistent with Section 51.907(h) of the Commission's Rules, 47 C.F.R. § 51.907(h). See generally Material to be Filed in Support of 2018 Annual Access Tariff Filings, WC Docket No. 18-100, Order, DA 18-404, (Wireline Competition Bur., rel. April 25, 2018) ("TRP Order"). The FCC template provides the methodology for calculating the rate reductions and identifies in detail the interstate access rates that are required to be reduced consist with FCC's Rules. Step 7 of the USF/ICC Transformation Order, as set forth in Section 51.907(h), requires Price Cap Carriers to establish, for interstate and intrastate terminating traffic traversing a tandem switch that the terminating carrier or its ILEC affiliates own, a composite Tandem-Switched Transport Access Service rate no greater than $0.0000 per minute. Therefore, the Tandem-Switched Transport demand was split between usage where Windstream ILEC owns both the Tandem and End-Office and usage where Windstream ILEC did not own the End Office or did not own the Tandem (i.e. Tandem to 3rd Party). To determine the amount of Tandem to 3rd Party traffic, a study using 2016 usage was conducted and all traffic not terminating with a Windstream ILEC End Office location and all traffic where a Windstream End Office was homed behind a non-affiliated 3rd Party tandem was deemed Tandem- to 3rd Party usage. 3rd Party traffic was divided by the total 2016 tandem usage by element times the total October 2010 thru September 2011 usage in the ICC models. This 3rd Party usage was then subtracted from the total usage and only the remaining usage was adjusted to the $0.0000/MOU tandem composite target rate. This filing makes the rate reduction for the Tandem to End Office. Other Tandem-Switched Transport Rates remain at their current levels including Tandem Trunk Ports per Rule 51.903(i) which expressly excludes rate elements in Part 69.111. Respective Intrastate Terminating End Office and Terminating Tandem rates are then set to no more than the corresponding Interstate rates thus keeping rates and rate structure in parity. Once Windstream adjusted the individual interstate tandem-switched transport access rates, compliance was tested to ensure the July 3, 2018 rates allowed for no higher than a Composite Terminating Tandem-Switched Transport Access Rate of $0.0000.

Intrastate Composite Terminating End Office and Tandem Switched Transport Access Rates. Respective Intrastate Terminating End Office and Tandem Switched Transport Access rates were set to no more than the corresponding Interstate rates thus keeping rates and rate structure in parity.

B. Reciprocal Compensation

In compliance with the FCC's USF/ICC Transformation Order, Windstream is including a single workbook to encompass the Holding Company required Reciprocal Compensation reductions. Windstream utilized the "Recip-Comp-Sample-Elig-Recv-Calc-Step-1" template released by the Federal Communications Commission ("FCC") on April 25, 2018 to determine the amount of eligible recovery from CMRS (Commercial Mobile Radio Service) Net Reciprocal Compensation revenues allowed by 47 C.F.R. §51.915(d)(1)(vii)(F), the amount of eligible recovery from non-CMRS Net Reciprocal Compensation an InterMTA CMRS Access Traffic revenues allowed by 47 C.F.R. §51.915(d)(1)(vii)(G).

The FCC spreadsheet template provides the methodology for calculating the CMRS Net Reciprocal Compensation. For each study area, Windstream’s FY 2011 CMRS revenues for intraMTA non-transit usage-based traffic is reduced by Windstream’s 2011 FY expenses for intraMTA non-transit usage-based traffic. The total CMRS Net Reciprocal Compensation Revenues for Windstream as a holding company are reduced to reflect the impact of removing disputed revenues or, revenues otherwise not recovered pursuant to paragraph 880 of the USF/ICC Transformation Order, CMRS expenses are then subtracted from the net revenue with the resulting Eligible Recovery included in the Eligible Recovery Form. Redacted and non-redacted versions of the template workbooks are included with this filing.

C. Access Recovery Charge (ARC Rate Ceiling) Worksheet

In compliance with the FCC’s USF/ICC Transformation Order, Windstream is including the Rate Ceiling-CAF and the Tariff Rate Comparison_CAF workbooks. The Rate Ceiling- CAF workbook is utilized by Windstream to calculate the Access Recovery Charge (“ARC”) allowed by 47 C.F.R. §51.915(e) and the CAF ICC allowed by 47 C.F.R. §51.915(f). Windstream’s supporting calculations utilize the templates released by the Federal Communications Commission ("FCC") on April 25, 2018.

The FCC Rate Ceiling-CAF workbook template provides the methodology for calculating Expected Access Recovery Charge Revenues and any CAF ICC. For each exchange, Windstream totaled the Residential Rate Ceiling Components and measured against the Residential Rate Ceiling benchmark of $30.00. A maximum Residential Access Recovery Charge is determined as $0.00 when the total of the Residential Rate Ceiling Components are $30.00 or greater, up to $2.00 when the total of the Residential Rate Ceiling Components is between $28.00 and $30.00 or capped at $2.50 when rate ceilings are below $28.00. Once the residential ARC per line is determined that value is multiplied by the eligible lines to result in the Residential Access Recovery Charge Revenue.

Single line business Access Recovery Charge Revenue is determined by multiplying single line business line counts by the per-line cap of $2.50. Multiline business Access Recovery Revenue is determined by multiplying the eligible multiline business line counts by the per-line cap of $5.00.

The total Access Recovery Charge Revenue from residential, single-line business and multiline business are compared to the total Eligible Recovery. Windstream's total Access Recovery Charge Revenue is less than the Eligible Recovery and therefore Windstream is eligible for CAF ICC support.

The Tariff Rate Comparison_CAF workbook demonstrates that Windstream has not included any tariffs which would allow for greater recovery than allowed through the caps placed on the Access Recovery Charge per the methodology included in the Rate Ceiling-CAF template. This workbook includes the ARC tariff by exchange. Redacted and non-redacted versions of the workbooks are included with this filing.

D. Eligible Recovery Worksheet

In compliance with the FCC's USF/ICC Transformation Order, Windstream is including the Eligible Recovery-TRP workbook. The Eligible Recovery-TRP workbook is utilized by Windstream to calculate the total Eligible Recovery allowed by 47 C.F.R. §51.915(d). Windstream's supporting calculations utilize the "Eligible Recovery" template released by the Federal Communications Commission ("FCC") on April 25, 2018.

The FCC spreadsheet template summarizes the eligible recovery at a study area level. Windstream has populated the spreadsheet with the reduction of

Transitional Intrastate Switched Access Service revenues as determined pursuant to 47 C.F.R. §51.907(b)(2) which are reduced from the ICC Access Reduction described above to reflect the impact of removing disputed revenues or, revenues otherwise not recovered, pursuant to paragraph 880 of the USF/ICC Transformation Order. In order to remove these revenues Windstream reviewed billing information for uncollected invoices that continued to be outstanding as of April 1, 2012 in order to obtain intrastate terminating switched access outstanding invoices for FY2011 data. Any amounts that had been written off prior to April 1, 2012 and removed from the uncollected invoice data due to bankruptcy were added back in order to be included as uncollected revenue for FY2011. Invoices where the direction of traffic could not be determined were included based on a percentage of the carrier's total traffic (Example: Total billed = $100, uncollected is $30, Intrastate Terminating = $50 (of total billing $100) or 50% of total billing, 50% of uncollected was included or $15 for the collectible factor calculation). Outstanding invoices remaining as of April 1, 2012 were included in the calculation of the collectible factor. Windstream had no partial payment settlements during the FY2011 time period that would apply to intrastate terminating switched access. All the uncollected invoices which applied to intrastate terminating switched access were added together to get the total uncollected intrastate terminating (excluding fees for services not provided, e.g. late payment charges). The total uncollected intrastate terminating amounts were then removed from total intrastate terminating revenue and divided by total intrastate terminating revenue to determine the collectible factor. The collectible factor was applied to each company's access reduction amount for eligible recovery in order to appropriately reduce for collectability. In addition, this spreadsheet template includes the eligible recovery for Net Reciprocal Compensation reductions as described above. Each Study Area amount is multiplied first by the Traffic Demand Factor as defined at 47 C.F.R. §51.915(b)(10) and then by either the CALLS Study Area Factor (§51.915(b)(2)) or the Non-Calls Study Area Factor (§51.915(b)(9)). Next the

Exogenous Cost ARC Recoverable amount, which is the excess exogenous cost that can not be recovered through the subscriber line charges, included as found in Cap 5 line 610 of the included Tariff Review Plan. The final step is to add the amounts together resulting in the Eligible recovery that is used in the “Rate Ceiling” template as described above.

E. Summary Eligible Recovery Worksheet

Included with the 2018 Price Cap Long Forms Tariff Review Plan forms is a workbook that summarizes, the required forms outlined above for both the 2016-2018 filings. Windstream has completed the form by extracting the data from the forms and populating the Summary Eligible Recovery form. Redacted and non-redacted versions of the workbooks have been prepared.

IV. Conclusion

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, price cap indices, and exogenous costs.

EXHIBIT COSA

Issuing Carrier	COSA
Windstream Alabama	WSAL
Windstream Arkansas	WSAR
Windstream Florida	WSFL
Georgia Properties[1]	WSGP
Windstream Standard	WSST
Windstream Kentucky West	WSKY
Windstream Kerrville	WSKR
Windstream Mississippi	WSMS
Windstream Missouri	WSMO
Windstream North Carolina	ALNC
New York Properties[2]	WSNY
Windstream Ohio	WSOH
Oklahoma Properties[3]	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

[1] Georgia Properties includes Windstream Georgia, Georgia Windstream and Windstream Georgia Communications.
[2] New York Properties includes Windstream New York – Fulton, Windstream New York – Jamestown and Windstream New York – Red Jacket.
[3] Oklahoma Properties includes Windstream Oklahoma and Oklahoma Windstream.