

NATIONAL EXCHANGE CARRIER ASSOCIATION, INC.

ACCESS TARIFF REVISIONS TARIFF F.C.C. NO. 5
TRANSMITTAL NO. 1709

Description and Justification

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I. INTRODUCTION AND SUMMARY

NECA's *2023 Annual Filing*¹ modified company-specific Common Line and Consumer Broadband Only Loop charges and underlying data, and became effective as scheduled. NECA routinely makes midmonth filings modifying rates and/or universal service support for certain study areas. On July 24, 2023 the FCC released a Report and Order providing carriers the opportunity to receive Enhanced Alternative Connect America Cost model-based support (EA-CAM) effective January 1, 2024 for a fixed 15-year period.² Subsequently, on August 30, 2023, the Wireline Competition Bureau released a public notice with information regarding the amount of each carrier's EA-CAM offer and a further public notice on September 21, 2023 with corrected EA-CAM offers for 82 companies.³

The EA-CAM order required legacy carriers authorized to receive EA-CAM support to exit the NECA CL pool.⁴ This filing is an update to NECA's *December 2023 Filing*⁵ and implements the required exits from the CL pool for those rate of return carriers accepting model-based support for the first time with their acceptance of EA-CAM offers. The EA-CAM order also gave carriers, required to exit the CL pool, "the option of continuing to use NECA to tariff their Common Line and CBOL charges."⁶ Accordingly, this filing implements changes in NECA's CL and CBOL tariff participation for EA-CAM

¹ National Exchange Carrier Association, Inc., Tariff F.C.C. No. 5, Transmittal No. 1694 (filed Jun. 16, 2023) (*2023 Annual Filing*).

² *Connect America Fund*, WC Docket Nos. 10-90, *ETC Annual Reports and Certifications*, 14-58, *Telecommunications Carriers Eligible to Receive Universal Service Support*, 09-197, *Connect America Fund – Alaska Plan*, 16-271, *Expanding Broadband Service Through the ACAM Program*, RM-11868, Report and Order, Notice of Proposed Rulemaking, and Notice of Inquiry, FCC 23-60 (rel. July 24, 2023) (*Enhanced ACAM Order*).

³ See *Wireline Competition Bureau Announces Enhanced Alternative Connect America Cost Model Support Amounts Offered to Rate-of-Return Carriers to Expand Rural Broadband*, WC Docket No. 10-90, Public Notice, DA 23-779 (rel. Aug. 30, 2023). See also *Wireline Competition Bureau Announces Corrected Enhanced Alternative Connect America Cost Model Support Offers for 82 Companies*, WC Docket No. 10-90, Public Notice, DA 23-835 (rel. Sep. 21, 2023) (*Enhanced ACAM Offers*).

⁴ *Enhanced ACAM Order* ¶ 91.

⁵ National Exchange Carrier Association, Inc., Tariff F.C.C. No. 5, Transmittal No. 1708 (filed Dec. 15, 2023) (*December 2023 Filing*).

⁶ *Enhanced ACAM Order* ¶ 91.

electors, and implements a rate change for one EA-CAM elector. This filing also updates Federal Universal Support Charges as described in Section II. This filing is scheduled to be effective on January 1, 2024 under special permission number 23-008, granted December 1, 2023, and waiving 47 C.F.R. § 61.58.⁷

Coincident with this filing, NECA is filing the eighth amendment to its *2023 Annual Filing* to include updated CAF BLS TRP data. The CAF BLS TRP has been modified to remove support data from legacy support study areas electing EA-CAM as described in Section V.

II. FEDERAL UNIVERSAL SERVICE CHARGE UPDATES

NECA proposes to increase its Federal Universal Service Surcharge (FUSC) percentage and optional Multi-line Business End User Common Line (MLB EUCL) FUSC banded percentages in response to the first quarter 2024 Universal Service Contribution Factor of 34.6% published in the FCC's December 14, 2023 Public Notice⁸. NECA proposes to update its FUSC surcharges to reflect this updated factor.

A. BACKGROUND

The Universal Service funding obligation is recovered through the FUSC surcharge on interstate end user common line access retail revenues, ARC revenues, and Special Access retail revenues. The interstate end user common line access retail revenues consist of Subscriber Line Charge revenue

⁷ See Letter from Gil M. Strobel, Chief, Pricing Policy Division, FCC to Susan Boylan, NECA, (Dec. 1, 2023).

⁸ *Proposed First Quarter 2024 Universal Service Contribution Factor*, CC Docket No. 96-45, Public Notice, DA 23-1156 (rel. Dec 14, 2023).

(excluding lifeline revenue), ISDN port revenue, DS1 line port revenue, and Special Access Surcharge revenue.

On June 8, 2018, the FCC released the *2018 USF Forbearance Order*⁹ granting temporary forbearance from applying USF reporting and contribution requirements on rural LEC-provided broadband Internet access transmission services offered on a common carrier basis. Effective July 3, 2018, rural ILECs were eligible to forbear from assessing FUSC on ADSL, SDSL and CBOL revenues. All NECA CL tariff participants listed in Section 17.7(A) of Tariff No. 5 are taking advantage of the forbearance relief and no longer report end user revenues to USAC on broadband Internet access transmission services or assess the FUSC surcharge factor on broadband Internet access transmission charges.

MLB EUCL FUSC optional rate banding is a tiered pricing structure that allows LECs to recover contribution costs from Centrex customers using the 1/9 equivalency ratio and to recover the remaining contribution costs associated with Centrex customers from other multi-line business customers in the same tier. Currently 12 study areas utilize MLB EUCL FUSC rate banding. Each company opting for MLB EUCL FUSC rate banding was placed in a rate band designed to recover its individual contribution costs.

B. PROPOSED SURCHARGE PERCENTAGES

The proposed FUSC surcharge to be applied to end user and special access retail revenues is presented in Table 1 and the proposed optional MLB EUCL FUSC band surcharges are summarized in Table 2:

⁹ *Petition of NTCA—The Rural Broadband Association and the United States Telecom Association for Forbearance Pursuant to 47 U.S.C. § 160(c) from Application of Contribution Obligations on Broadband Internet Access Transmission Services*, WC Docket No. 17-206, Order, FCC 18-75 (rel. June 8, 2018) (*2018 USF Forbearance Order*).

TABLE 1: Federal Universal Service Surcharge

Current Surcharge	Proposed Surcharge	Change (%)
34.5%	34.6%	0.3%

TABLE 2: Optional MLB EUCL FUSC Band Surcharges

BAND	Current Surcharge	Proposed Surcharge
1	34.6%	34.7%
2	34.7%	34.8%
3	35.2%	35.3%
4	36.0%	36.1%
5	36.2%	36.3%
6	36.4%	36.5%
7	37.7%	37.8%
8	39.2%	39.3%
9	41.9%	42.0%
10	48.0%	48.1%
11	56.0%	56.2%
12	77.3%	77.6%

C. CALCULATION OF REVISED SUPPORT CONTRIBUTIONS AND MULTI-LINE FUSC SURCHARGES

Exhibit 1 shows adjusted projections for End User Retail Revenue, ARC Retail Revenue and Special Access Retail Revenue. Effective January 1, 2024, Enhanced A-CAM electors are required to leave NECA's common line pool. These revenues for the first and second quarter of 2024 were reduced to account for Enhanced A-CAM study areas exiting NECA's common line pool. Using the 3Q2023

contribution factor of 29.2%, the restated test period Federal Universal Service Support Mechanism (USSM) contribution of \$31.7M reflects a decrease of \$4.0M from the filed amount of \$35.7M in the *2023 Annual Filing*.

Exhibit 2 shows adjusted projections for USSM contributions for the first and second quarters of 2024 as well as the 2023/2024 test period. The adjusted test period USSM contribution of \$35.9M reflects an increase of \$4.1M from the restated test period USSM amount of \$31.7M.

Exhibit 3 displays the development of the first quarter 2024 optional MLB EUCL FUSC band rates and the projection of optional MLB EUCL FUSC band revenue for the first and second quarters of 2024. There were no Enhanced A-CAM electors among the companies currently using the optional MLB EUCL FUSC rate banding. Based on the test period Business Centrex and MLB banded revenues in Vol. 4 Exhibit 6 of the *2023 Annual Filing*, the revised MLB EUCL FUSC surcharges reflect the proposed first quarter 2024 contribution factor of 34.6%. The exhibit shows the projected MLB EUCL FUSC banded revenue of \$0.3M on Line 13 for the first and second quarters of 2024.

Exhibit 4 displays the development of the projected FUSC non-banded revenue of \$15.8M on Line 5, the projected FUSC banded revenue of \$0.3M on Line 6, and the projected total FUSC revenue of \$16.1M on Line 7 for the first and second quarters of 2024.

Finally, Exhibit 5 displays the development of adjusted 2023/2024 test period FUSC revenue of \$35.9M on Line 3. The adjusted test period FUSC revenue equals the adjusted test period 2023/2024 USSM contribution amount of Exhibit 2 Column C Line 5. Therefore, the proposed FUSC charges conform to the FCC rules.

D. CONCLUSION

The proposed FUSC surcharges comply with the Commission's rules and should be allowed to become effective on January 1, 2024.

III. COMMON LINE POOL PARTICIPATION AND REVENUE REQUIREMENT CHANGES

Study areas receiving EA-CAM offers were required to make final elections by October 1, 2023.¹⁰ Subsequently, on October 30, 2023 the WCB issued a public notice authorizing EA-CAM support to 368 electing rate-of-return companies, including those legacy study areas converting from CAF BLS to EA-CAM, 116 of which belonged to the NECA CL pool.¹¹ This filing reflects the authorization of EA-CAM support and the notice of their pending exit from the CL pool made by those 116 pooling study areas, as required by the *Enhanced ACAM Order*.¹² The list of EA-CAM electors exiting the CL pool is displayed in Exhibit 6.

The removal of costs and revenues from the CL pool for the EA-CAM electors will not affect the targeted 9.75 percent rate of return as each carrier remaining in the CL pool on legacy mechanisms will have its support trued up to the authorized level. The removal of EA-CAM electors from the CL pool results in a reduction to CL and CBOL revenue requirements as shown in the table below. Including the effects of CBOL tariff changes, the reduction to 2023/2024 test period CL and CBOL revenue requirement is \$428.5M, resulting in a revised 2023/2024 test period CL and CBOL revenue requirement of \$1,142.9M. The 2023/2024 test period CBOL revenue requirement for pool participants now totals

¹⁰ *Enhanced ACAM Order* ¶ 32.

¹¹ *Wireline Competition Bureau Authorizes 368 Companies in 44 States to Receive Enhanced Alternative Connect America Cost Model Support to Expand Rural Broadband*, WC Docket No. 10-90, Public Notice, DA 23-1025 (rel. Oct. 30, 2023) (*Enhanced ACAM Authorization Public Notice*).

¹² *Enhanced ACAM Order* ¶ 91.

\$795.0M for the 265 NECA CL cost and average schedule study areas that have opted to have NECA tariff their CBOL rates effective with this filing. This summary includes the effects of CBOL changes made in the *December 2023 filing*.

2023/2024 Test Period Revenue Requirement effects due to CL pool exits (\$M)

	Before EA-CAM pool exits	After EA-CAM pool exits	Difference
CL RRQ	\$470.7	\$347.9	\$122.8
CBOL RRQ	\$1,100.7	\$795.0	\$305.7
Total (CL + CBOL RRQ)	\$1,571.4	\$1,142.9	\$428.5

IV. TARIFF CHANGES

For study areas electing model-based support, the FCC requires that CBOL rates be capped at \$42 per loop per month.¹³ While these study areas are required to exit the CL pool, they may choose to participate in the NECA tariffs by listing their CBOL, CL and/or EU rates.¹⁴ Legacy carriers accepting model support for the first time, under EA-CAM, were given the opportunity to modify their respective CL, EU and/or CBOL rates using an online data collection system established by NECA for this purpose. This filing implements those tariffing choices.

¹³ *Access Charge Tariff Filings Introducing Broadband-only Loop Service Order*, WC Docket No. 16--317, Order, 31 FCC Rcd 11017 (2016) ¶ 4.

¹⁴ *Enhanced ACAM Order* ¶ 91.

A. ADJUSTMENTS TO COMMON LINE, END USER AND/OR CBOL TARIFF

As noted above, legacy companies electing EA-CAM support were required to notify NECA of their exit from the CL pool. This notice was due by November 17, 2023.¹⁵ In conjunction with this notification, these carriers subsequently notified NECA of their decision whether to remain in the NECA CL, EU and CBOL tariffs and indicated the rate level (up to the permitted caps) for each rate element listed in NECA's tariffs. In response to these elections, NECA is removing eleven study areas from the CL and EU tariffs. Ten of these study areas also elected removal from NECA's CBOL tariff. The eleventh study area did not participate in the CBOL tariff. The list of these study areas is displayed in Exhibit 7. The number of study areas electing model support for the first time and choosing to participate in NECA's CL, EU and/or CBOL tariffs is 105.

B. ADJUSTMENTS TO COMMON LINE, END USER AND/OR CBOL RATES

Only one study area electing model support for the first time opted to modify a rate. The CBOL rate for this study area increases to \$42 in this filing. The remaining study areas electing model support for the first time opted to keep all CL, EU and CBOL rates unchanged.

V. CAF BLS SUPPORT ADJUSTMENTS

Concurrent with this filing, NECA is making the eighth amendment to the *2023 Annual Filing* Transmittal No. 1694 to include updated Tariff Review Plan (TRP) CAF BLS data. The estimated CAF BLS Broadband-only support data has been removed for companies electing model-based support for the first time under EA-CAM.

¹⁵ See *Enhanced ACAM Authorization Public Notice*.

The following estimated support projections do not include the effects of the Budget Control Mechanism or \$200 cap/line/month. Projected CAF BLS support (including voice and broadband-only) prior to the removal of 116 EA-CAM electors was \$1,114.8M for the period of July 2023 through June 2024. The revised projected CAF BLS support amount for that same period, excluding EA-CAM electors, is \$810.6M.

DECEMBER 18, 2023 NECA ACCESS CHARGE FILING
TEST PERIOD: JULY 1, 2023 - JUNE 30, 2024
UNIVERSAL SERVICE SUPPORT MECHANISM (USSM) CONTRIBUTION
QUARTERLY INTERSTATE RETAIL REVENUE OF USSM CONTRIBUTORS
(\$ MILLION)

EXHIBIT 1

<u>LINE NO</u>	<u>DATE</u>	<u>PROJECTED USSM END USER RETAIL REVENUE ¹</u> (A)	<u>PROJECTED USSM ARC RETAIL REVENUE ²</u> (B)	<u>PROJECTED USSM SPECIAL ACCESS RETAIL REVENUE ³</u> (C)	<u>PROJECTED INTERSTATE RETAIL REVENUE (IRR)</u> (D = A + B + C)
1	TP 2023/2024 ANNUAL FILING	\$80.7	\$12.4	\$29.3	\$122.4
2	3Q 2023	\$20.7	\$3.2	\$7.5	\$31.4
3	4Q 2023	\$20.3	\$3.1	\$7.4	\$30.8
4	RESTATED 1Q 2024	\$14.9	\$2.2	\$6.3	\$23.4
5	RESTATED 2Q 2024	\$14.8	\$2.1	\$6.2	\$23.1
6	RESTATED TP 2023/2024 (sum of Line 2 through Line 5)	\$70.6	\$10.6	\$27.5	\$108.7
7	3Q 2023 CONTRIBUTION FACTOR	DA 23-507			29.2%
8	FILED TOTAL TEST PERIOD USSM CONTRIBUTION	LINE 1 * LINE 7			\$35.7
9	RESTATED TOTAL TEST PERIOD USSM CONTRIBUTION ⁴	LINE 6 * LINE 7			\$31.7

NOTE

1 End user retail revenue is the sum of SLC revenue (excluding life lines revenue), ISDN port revenue, DS1 channel service port revenue and Special Access Surcharges. NECA priced these revenues at proposed rate for 3Q 2023 through 2Q 2024.

2 NECA priced ARC retail revenues at proposed rate for 3Q 2023 through 2Q 2024.

3 Special access retail revenue excludes ADSL and SDSL retail revenue per 2018 USF Forbearance Order.

4 NECA restated the USSM contribution for the test period 2023/2024 to reflect Enhanced A-CAM electors existing NECA's Common Line Pool.

DECEMBER 18, 2023 NECA ACCESS CHARGE FILING
TEST PERIOD: JULY 1, 2023 - JUNE 30, 2024
UNIVERSAL SERVICE SUPPORT MECHANISM (USSM) CONTRIBUTION
QUARTERLY INTERSTATE RETAIL REVENUE OF USSM CONTRIBUTORS
(\$ MILLION)

EXHIBIT 2

<u>LINE NO</u>	<u>DATE</u>	<u>PROJECTED INTERSTATE RETAIL REVENUE (IRR) ¹</u> (A)	<u>SOURCE / SUMMARY</u>	<u>CONTRIBUTION FACTOR ²</u> (B)	<u>USSM ³</u> (C = A * B)
1	3Q 2023	\$31.4	EX 1 COL D LINE 2	29.2%	\$9.2
2	4Q 2023	\$30.8	EX 1 COL D LINE 3	34.5%	\$10.6
3	RESTATED 1Q 2024	\$23.4	EX 1 COL D LINE 4	34.6%	\$8.1
4	RESTATED 2Q 2024	\$23.1	EX 1 COL D LINE 5	34.6%	\$8.0
5	ADJUSTED USSM TP 2023/2024	\$108.7	LINE 1 + LINE 2 + LINE 3 + LINE 4		\$35.9
6	RESTATED USSM TP 2023/2024	\$108.7	EX 1 COL D LINE 6	29.2%	\$31.7
7	FILED USSM TP 2023/2024	\$122.4	2023 ANNUAL FILING V2 EX 8 LINE 7	29.2%	\$35.7

NOTE:

- 1 Includes EU Retail Revenues, ARC Retail Revenues and Special Access Retail Revenues. Per the *2018 USF Forbearance Order*, broadband Internet access transmission service revenues were excluded.
- 2 Proposed Third Quarter 2023 Universal Service Contribution Factor, FCC Public Notice DA 23-507, released June 14, 2023; Proposed Fourth Quarter 2023 Universal Service Contribution Factor, FCC Public Notice DA 23-843, released September 13, 2023; Proposed First Quarter 2024 Universal Service Contribution Factor, FCC Public Notice DA 23-1156, released December 14, 2023.
- 3 Calculations are done with more digits than displayed.

DECEMBER 18, 2023 NECA ACCESS CHARGE FILING
DEVELOPMENT OF 1Q 2024 OPTIONAL MULTI-LINE FUSC SURCHARGE AND
1Q 2024 THROUGH 2Q 2024 OPTIONAL MULTI-LINE FUSC REVENUE

EXHIBIT 3

LINE NO	FUSC BAND	BUSINESS CENTREX %	TEST PERIOD MULTI-LINE REVENUE ¹	TEST PERIOD BUSINESS CENTREX REVENUE ²	1Q 2024 MLB EUCL FUSC SURCHARGE ³	PROJECTED 1Q 2024 - 2Q 2024 MLB FUSC REVENUE
			(A)	(B)	(C)	(D) = ((A - B)+ B / 9) * C * 2/4
1	1	0.4%	\$26,938	\$110	34.7%	\$4,661
2	2	0.5%	\$0	\$0	34.8%	\$0
3	3	2.2%	\$0	\$0	35.3%	\$0
4	4	4.8%	\$218,482	\$10,378	36.1%	\$37,802
5	5	5.4%	\$22,632	\$1,214	36.3%	\$3,915
6	6	5.8%	\$76,286	\$4,416	36.5%	\$13,199
7	7	9.5%	\$0	\$0	37.8%	\$0
8	8	13.4%	\$705,787	\$94,282	39.3%	\$122,126
9	9	19.9%	\$77,722	\$15,456	42.0%	\$13,446
10	10	31.6%	\$12,917	\$4,085	48.1%	\$2,235
11	11	43.2%	\$0	\$0	56.2%	\$0
12	12	62.3%	\$460,699	\$287,040	77.6%	\$79,703
13	TOTAL		\$1,601,462	\$416,981		\$277,086

1. Following FCC Order on Reconsideration in CC Docket No. 96-45 (FCC 08-51) released on February 14, 2008, Payphone Service Provider Lines are excluded from calculation of MLB EUCL FUSC surcharges. *See the 2023 Annual Filing V4 EX 6 COL A.*

2. *2023 Annual Filing V4 EX 6 COL B.*

3. The following formula is used to calculate Multi-line FUSC surcharge for each band:

Contribution Factor/(1 - 8/9 * Business Centrex Rev / MLB Rev).

Bands with no MLB revenue projected are occupied by model supported study areas.

DECEMBER 18, 2023 NECA ACCESS CHARGE FILING
DEVELOPMENT OF 1Q 2024 THROUGH 2Q 2024 FEDERAL UNIVERSAL SERVICE CHARGE REVENUE
(\$ MILLION)

EXHIBIT 4

LINE NO.	ITEM	SOURCE	AMOUNT ¹
1	PROJECTED INTERSTATE RETAIL REVENUE	SUM of EX 2 Col A LINE 3 to LINE 4	\$46.5
2	PROJECTED BANDED MLB REVENUE	EX 3 COL A LINE 13 / 1,000,000 * 2/4	\$0.8
3	PROJECTED INTERSTATE RETAIL REVENUE EXCLUDING BANDED MLB REVENUE	LINE 1 - LINE 2	\$45.7
4	FUSC SURCHARGE	EX 2 COL B LINE 3	34.6%
5	PROJECTED FUSC SURCHARGE FROM NON-BANDED REVENUE	LINE 3 * LINE 4	\$15.8
6	PROJECTED FUSC SURCHARGE FROM BANDED MLB REVENUE	EX 3 COL D LINE 13 /1,000,000	\$0.3
7	PROJECTED 1Q 2024 THROUGH 2Q 2024 FUSC REVENUE	LINE 5 + LINE 6	\$16.1

NOTE:

1 Calculations are done with more digits than displayed.

DECEMBER 18, 2023 NECA ACCESS CHARGE FILING
TEST PERIOD: JULY 1, 2023 - JUNE 30, 2024
DEVELOPMENT OF ADJUSTED TEST PERIOD FEDERAL UNIVERSAL SERVICE CHARGE REVENUE
(\$ MILLION)

EXHIBIT 5

LINE NO.	ITEM	SOURCE	AMOUNT ¹
1	3Q 2023 THROUGH 4Q 2023 FUSC REVENUE	EX 2 COL C LINE 1 + LINE 2	\$19.8
2	PROJECTED 1Q 2024 THROUGH 2Q 2024 FUSC REVENUE	EX 4 LINE 7	\$16.1
3	ADJUSTED TEST PERIOD FUSC REVENUE	LINE 1 + LINE 2	\$35.9
4	TEST PERIOD FUSC REVENUE RESTATED FOR ENHANCED A-CAM ELECTION	EX 2 COL C LINE 9	\$31.7
5	FILED TEST PERIOD FUSC REVENUE	2023 ANNUAL FILING V2 EX 8 LINE 7	\$35.7

NOTE:

1 Calculations are done with more digits than displayed.

Legacy EA-CAM electors required to exit the CL Pool

Study Area Code	Company Name	State
120039	Granite State Telephone Company	NH
140068	Topsham Tel. Co.	VT
147332	Vermont Telephone Co., Inc.	VT
150097	Germantown Telephone Company, Inc.	NY
150112	Ontario Telephone Company, Inc.	NY
150131	Trumansburg Telephone Company, Inc.	NY
160135	Alteva of Warwick LLC	NJ
170175	Ironton Tel. Co.	PA
170177	Lackawaxen Telecommunications Services, Inc.	PA
170189	Armstrong Tel. Co. - PA	PA
170195	Armstrong Telephone Company North	PA
170205	South Canaan Telephone Company, Inc.	PA
170215	Yukon Waltz Telephone Company	PA
180216	Armstrong Telephone Company of MD	MD
190219	EMPOWER Telecom, Inc.	VA
190239	New Hope Telephone Cooperative	VA
220378	Planters Rural Telephone Cooperative, Inc.	GA
220389	Trenton Telephone Company	GA
230469	Barnardsville Telephone Company d/b/a RiverStreet Networks	NC
230478	Ellerbe Telephone Company, Inc. d/b/a RiverStreet Networks	NC
230498	Saluda Mountain Telephone Company d/b/a RiverStreet Networks	NC
230500	Service Telephone Company d/b/a RiverStreet Networks	NC
230505	Wilkes Telephone Membership Corporation (Tri-County) d/b/a RiverStreet Networks	NC
230510	Wilkes Telephone Membership Corporation d/b/a RiverStreet Networks	NC
230511	Yadkin Valley Telephone Membership Corp.	NC
240512	Bluffton Telephone Company, Inc.	SC
240523	Hargray Tel. Co. Inc.	SC
250290	Farmers Telecommunications Cooperative, Inc.	AL
250307	Moundville Telephone Company	AL
250308	New Hope Telephone Cooperative	AL
250315	Pine Belt Telephone Company, Inc.	AL
260396	Ballard Rural Tel. Coop. Corp., Inc.	KY
260406	Foothills Rural Telephone Coop. Corp.	KY
260415	Peoples Rural Telephone Cooperative Corp.	KY
260421	West Kentucky Rural Telephone Cooperative Corporation, Inc.	KY
270435	Northeast Louisiana Telephone Company, Inc.	LA
280466	Sledge Telephone Company, Inc.	MS
290553	Ben Lomand Rural Telephone Cooperative, Inc.	TN
290554	Bledsoe Tel. Coop.	TN
290573	North Central Telephone Cooperative, Inc.	TN
290579	Twin Lakes Telephone Cooperative Corp.	TN
300586	Arthur Mutual Telephone Company	OH
300589	Bascom Mutual Telephone Company	OH
300606	Conneaut Telephone Company	OH
300614	Fort Jennings Telephone Company	OH
300619	Glandorf Telephone Company, Inc.	OH
300625	Kalida Telephone Company, Inc.	OH
300650	Ottoville Mutual Telephone Company	OH
310679	Bloomington Telephone Company	MI
320775	Hancock Rural Telephone Corporation d/b/a NineStar Connect	IN
320790	Monon Telephone Company, Inc.	IN
320796	New Lisbon Telephone Company, Inc.	IN
320825	Sunman Telecommunications LLC	IN
320834	Washington County Rural Tel. Coop., Inc.	IN
330902	Lakeland Communications Group, LLC	WI
330918	Nelson Communications Cooperative	WI
330949	Siren Telephone Company, Inc.	WI
330953	Spring Valley Telephone Company, Inc.	WI
330974	Wood County Telephone Company	WI
341032	Home Telephone Co.	IL

Legacy EA-CAM electors required to exit the CL Pool

Study Area Code	Company Name	State
351157	Ellsworth Coop. Telephone Association	IA
351158	Minburn Telecommunications, Inc.	IA
351174	Farmers Mutual Telephone Company of Stanton, Iowa	IA
351175	Farmers Telephone Company	IA
351188	Goldfield Telephone Company	IA
351225	Lehigh Valley Coop. Tel. Assoc.	IA
351245	Minburn Telephone Company	IA
351251	Mediapolis Telephone Company	IA
351271	Panora Communications Cooperative	IA
351283	Royal Telephone Company	IA
351298	South Slope Coop. Tel., Inc.	IA
351304	South Slope Cooperative Telephone Company (Swisher)	IA
361373	Consolidated Telephone Company	MN
361387	Emily Cooperative Telephone Company	MN
361426	Manchester-Hartland Telephone Company	MN
361499	Tri-Co Technologies, LLC d/b/a Crosslake Communications	MN
371526	Cambridge Telephone Company	NE
371540	Diller Telephone Co.	NE
371557	Hartman Telephone Exchanges, Inc.	NE
371591	Southeast Nebraska Communications, Inc.	NE
371597	Wauneta Telephone Company	NE
372455	Benkelman Telephone Company, Inc.	NE
391647	Cheyenne River Sioux Tribal Telephone Authority	SD
401697	Central Arkansas Tel. Coop., Inc.	AR
401704	Lavaca Telephone Company	AR
401709	Madison County Tel. Co., Inc.	AR
401718	Prairie Grove Telephone Company	AR
401724	Southwest Arkansas Telephone Cooperative, Inc.	AR
411746	Blue Valley Tele-Communications, Inc.	KS
411847	Wheat State Telephone Company	KS
421860	Alma Communications Company d/b/a Alma Telephone Company	MO
421901	Kingdom Telephone Company	MO
421912	McDonald County Telephone Company	MO
421920	Miller Telephone Company	MO
431704	Lavaca Telephone Company	OK
431969	Bixby Telephone Company	OK
432008	Medicine Park Telephone Company	OK
432029	Terral Telephone Company	OK
442039	Big Bend Telephone Company, Inc.	TX
442076	Ganado Telephone Company, Inc.	TX
442090	Alenco Communications, Inc.	TX
442130	Peoples Telephone Cooperative	TX
442159	Valley Telephone Cooperative, Inc.	TX
452200	Fort Mojave Telecommunications, Inc.	AZ
462182	Blanca Telephone Company d/b/a Blanca Networks	CO
462194	Nunn Telephone Company	CO
472220	Filer Mutual Telephone Company d/b/a TruLeap Technologies	ID
482257	Triangle Telephone Cooperative Association, Inc.	MT
483310	Triangle Telephone Cooperative Association, Inc. - CMC	MT
492263	La Jicarita Rural Tel. Coop., Inc.	NM
493403	Sacred Wind Communications, Inc.	NM
500758	Direct Communications Cedar Valley, LLC	UT
522442	St. John Telephone, Inc.	WA
522451	Western Wahkiakum County Telephone Company	WA
532383	Molalla Telephone Company	OR
532397	Scio Mutual Telephone Company	OR

Exhibit 7

EA-CAM electors electing to leave CL/CBOL/EU tariffs

Study Area Code	Company Name	State
120039	Granite State Telephone Company	NH
190239	New Hope Telephone Cooperative	VA
230511	Yadkin Valley Telephone Membership Corp.	NC
351175	Farmers Telephone Company	IA
351271	Panora Communications Cooperative	IA
351298	South Slope Coop. Tel., Inc.	IA
351304	South Slope Cooperative Telephone Company (Swisher)	IA
432008	Medicine Park Telephone Company *	OK
442076	Ganado Telephone Company, Inc.	TX
462194	Nunn Telephone Company	CO
532397	Scio Mutual Telephone Company	OR

*This study area is not exiting NECA's CBOL tariff as they do not currently participate in the CBOL tariff