

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

In the Matter of)	
)	WCB/Pricing File No. 06-15
July 2006)	
Annual Access Charge Tariff Filings)	

PETITION OF AT&T INC.¹

Pursuant to Section 1.773 of the Commission's rules (47 C.F.R. §1.773), AT&T Inc. ("AT&T") hereby requests that the Commission reject, or in the alternative investigate and suspend for the full five month period permitted by statute, the 2006 annual access tariff filings of the carriers listed in Appendix A to this Petition.

As AT&T shows below, analysis of these carriers' support for the proposed rates demonstrates that these charges have been improperly developed, and that as a direct result the charges are materially overstated. At a minimum, therefore, the tariff filings raise serious questions of lawfulness that require Commission action to preclude their taking effect as currently scheduled with consequent significant harm to access rate payers and end users.²

¹ On November 18, 2005, SBC Communications Inc. closed on its merger with AT&T Corp. The resulting company is now known as AT&T Inc. In these comments, "AT&T" refers to the merged company and its wholly-owned subsidiaries unless otherwise noted.

² A tariff is subject to rejection when it is *prima facie* unlawful, in that it demonstrably conflicts with the Communications Act or a Commission rule, regulation or order. *See, e.g., American Broadcasting Companies, Inc. v. AT&T*, 663 F.2d 133, 138 (D.C. Cir. 1980); *MCI v. AT&T*, 94 F.C.C.2d 332, 340-41 (1983). Suspension and investigation are appropriate where a tariff raises substantial issues of lawfulness. *See AT&T* (Transmittal No. 148), Memorandum Opinion and Order, 56 RR2d 1503 (1984); *ITT* (Transmittal No. 2191), 73 F.C.C.2d 709, 716 n.5 (1979) (*citing AT&T*, 46 F.C.C.2d 81, 86 (1974)).

ARGUMENT

I. NECA HAS UNDERSTATED ITS PROJECTED REVENUES AND OVERSTATED ITS PROJECTED REVENUE REQUIREMENT FOR THE SPECIAL ACCESS CATEGORY

NECA reports that, as of April 2006, its rate of return on Special Access for the 2005 calendar year was 14.15 percent.³ Notwithstanding that this rate of return already exceeds the authorized rate of return of 11.25 percent, NECA has proposed to increase its special access rates by 3.88 percent, or \$18.635 million dollars.⁴ To justify this rate increase, NECA has developed an analysis purporting to show that its most recently reported rate of return for the Special Access category will dramatically decline as a result of (a) projected revenue adjustments that reflect rate decreases in July, 2005 and April, 2006, as well as adjustments to reflect additional costs that are yet to be reported by its Special Access tariff participants, and (b) adjustments for the DSL portion of the Special Access pool predicated on the fact that a number of ILECs have recently withdrawn from NECA's pools.⁵ Neither of these purported justifications withstands scrutiny.

As a threshold matter, although NECA has asserted that carriers are slow to report their costs to the pool, and that as a consequence the pools return will decline, it has also elsewhere acknowledged that these reporting issues should be *less* significant in the future as the reporting process becomes more

³ See NECA Transmittal No. 1129, filed June 16, 2006, Volume 1, Table 6.

⁴ See NECA Transmittal No. 1129, filed June 16, 2006, Volume 1, Table 8.

⁵ NECA in Transmittal No. 1129, Volume 1 Exhibit 1 provides letters detailing the number of LECs leaving the pools, from which it is apparent that the exiting service is largely DSL.

streamlined.⁶ The support for the current tariff filing does not even attempt to reconcile these facially inconsistent representations on NECA's part.

Moreover, with respect to its adjustment to reflect the ILECs that are exiting NECA's DSL pool, NECA estimates a \$29.21 million reduction in Special Access pool revenues for 2005, while the corresponding reduction in related costs for that same period is only \$19.139 million. According to the data provided by NECA, before accounting for the exit of these ILECs from NECA's DSL pool (i.e., when only the revenue and cost adjustments already discussed above are taken into account) the rate of return for NECA's Special Access pool was approximately 2.8 percent.⁷ Because NECA's other Special Access rates are calculated based on the residual revenue left after DSL revenue, it follows that the DSL rate of return, prior to accounting for the effects of depooling, was also approximately 2.8 percent. With such an earnings level for the DSL pool, the cost for DSL services that are exiting the pool necessarily was substantially *higher* than the revenue being recovered at the prices set by NECA for DSL services.⁸

It should therefore be expected that NECA would remove *more* costs than revenues for the exiting DSL service, but as noted above the relationship is exactly the opposite. NECA has provided no justification why it is removing a significantly lower amount of costs than revenues for the exiting DSL services. The Commission should therefore, at a minimum, suspend and investigate the tariff and require NECA as part of that investigation properly to justify the

⁶ See "Report on Timing of NECA Pool True-Up Submissions and FCC Form 492 Interstate Earnings Monitoring Reports," filed Jan. 14, 2005 by NECA in WC Docket No. 05-29, pp. 14-24.

⁷ The calculation of these earnings is set forth in Exhibit 1 attached

⁸ By definition, under a rate-of-return regime a carrier's revenue requirement equals the sum of (i) allowable expenses and (ii) the authorized return multiplied by the average net plant in-service. If the actual revenue is below the revenue requirement, the company will not achieve its target earnings level..

amount of costs and revenues being removed from its Special Access pool for the companies that will exit the NECA DSL pool.⁹

II. ALLTEL AND CONSOLIDATED COMMUNICATIONS HAVE IMPROPERLY COMPUTED THEIR ADSL REVENUES AND COSTS, THEREBY OVERSTATING THEIR SPECIAL ACCESS RATES

AT&T's analysis of the proposed tariffs indicates that large number of Alltel study areas understated their DSL revenues by at least a total of \$9,175,000,¹⁰ and that Consolidated Communications-Fort Bend and Consolidated Communications-Texas have also understated their DSL revenues by a total of at least \$1,995,000.¹¹ By so doing, these carriers have assigned an improper amount of DSL costs to Special Access services. As a result, Alltel and Consolidated Communications Special Access customers would subsidize a large portion of those carriers' DSL services if the proposed tariffs take effect. The Commission should therefore require both companies to recompute their assignments of DSL costs, and to reduce their proposed rates for Special Access.

Alltel has identified a significant amount of DSL investment in its cost studies and has assigned these costs to COE Category 4.11.¹² In accordance with the *GTE ADSL Order*,¹³ Alltel

⁹ Additionally, as part of that investigation, the Commission should address an error by NECA in Table 6 of its tariff support. Specifically the sum of the amounts shown for the "Cost Company RRQ" do not sum to \$310.880,000. In fact, the costs shown for that line sum to \$305.226,000. It therefore cannot be determined with certainty how significantly this error has impacted the data reflected in Table 6, nor can it be determined whether the error impacts the projected test period revenue requirement.

¹⁰ Exhibit 2A provides AT&T calculation of the revenue understatements by Alltel.

¹¹ Exhibit 2B provides AT&T's calculation of the revenues understatements for these Consolidated Communications study areas.

¹² See Alltel Transmittal No. 165, filed June 16, 2006, Volume 2, page 1, COE.411DSL.

has directly assigned these costs to the interstate jurisdiction as Special Access. Because Alltel has also identified its DSL investment, AT&T was able to determine the amount of Alltel's DSL revenue requirement by developing annual carrying charge factors that approximate the return, operating expenses and taxes associated with the DSL investment and its associated general support facilities ("GSF") costs.¹⁴

This annual carrying charge factor was applied to the total DSL and associated GSF investment to estimate the DSL revenue requirement residing in the Special Access revenue requirement for each Alltel study area. Using this process, AT&T has determined that the DSL revenue requirement should be approximately \$66,730,000 for the study areas it analyzed.¹⁵ AT&T then subtracted this amount from the total Special Access revenue requirement of \$103,282,000 for these same study areas, resulting in a residual amount of \$36,551,497 to be assigned to Special Access services. However, the Special Access revenues as determined by Alltel for these study areas amounted to \$45,727,000, indicating a subsidy of \$9,175,000. The Commission should therefore require, at a minimum reduce the rates for its Special Access customers accordingly.¹⁶

(Footnote continued from preceding page)

¹³ See *GTE Telephone Operating Cos.*, CC Docket No. 98-79, Memorandum Opinion and Order, FCC 98-292 (rel. Oct. 30, 1998) ("*GTE/ASDL Order*") ¶ 25.

¹⁴ AT&T determined the annual carrying charge factor for each study area by dividing the respective Special Access revenue requirement (prior to adjustments related to the Commission's *MAG* rulings) by the associated Special Access total plant in service ("TPIS") investment.

¹⁵ See Exhibit 2A, attached. AT&T understands that there may be additional costs associated with ADSL that are not readily identified within Alltel's cost studies, i.e., Cable and Wire Facilities ("CWF") investment and possible incidental costs such as Capital Leases, Leasehold Improvements and Intangibles. AT&T, therefore, believes its DSL estimate is conservative.

¹⁶ Moreover, as shown in Exhibit 2C, attached, it is apparent that the high capacity Special Access demand in Alltel study areas has increased significantly since 2004. Alltel generally has

(Footnote continued on following page)

Like Alltel, Consolidated Communications has assigned a large portion of the DSL costs to COE Category 4.11 in the case of Fort Bend, and to COE Category 4.11 and 4.12 in the case of Texas.¹⁷ Similarly to Alltel, Consolidated Communications has directly assigned these costs to the interstate jurisdiction as wide band Special Access. Using the process described above in this section, AT&T applied annual carrying charge factors to Fort Bend's and Texas' respective total DSL and associated GSF investment to estimate the DSL revenue requirement residing in the Special Access revenue requirement for Fort Bend and Texas and has determined that the DSL revenue requirement for both companies should be approximately \$4,187,000 in the aggregate.¹⁸

This amount was then subtracted from the total Special Access revenue requirement of \$7,924,000, resulting in a residual amount of \$3,736,000 to be assigned to Special Access. However, the Special Access revenues as determined by Consolidated Communications for Fort Bend and Texas amounted to \$5,732,000., indicating a subsidy of at least \$1,995,000. As a result, if the proposed rates are allowed to take effect, Consolidated Communication's Special Access customers will be burdened this subsidy. Accordingly, the Commission should require

(Footnote continued from preceding page)

appropriately responded to the demand increases by reducing its overall high capacity rates. However, in this filing Alltel has proposed rate increases in Alabama, Missouri and New York, where healthy demand growth is evident. These rate changes, which are driven by Special Access demand growth, do not remove the DSL subsidies by Special Access services reflected in AT&T's analysis described above, nor does Alltel justify this subsidy.

¹⁷ Consolidated Communications, Transmittal No. 12, filed June 16, 2006, Part 69 cost study for 2006-2007.

¹⁸ See Exhibit X-4 AT&T was not able to determine the CWF Cat 2 investment associated with ADSL that are not readily identified within the cost studies and, therefore, believes its DSL estimate is conservative.

Consolidated Communications to reduce the rates for its Special Access customers by at least \$1,995,000.¹⁹

III. THE COMMISSION SHOULD SUSPEND AND INVESTIGATE THE PROPOSED ACCESS TARIFFS OF CERTAIN ILECS THAT HAVE A HISTORY OF OVEREARNINGS

The Commission has long recognized that proposed access rates of ILECs subject to rate-of-return regulation may warrant heightened scrutiny in the tariff review process where the filing carriers have a demonstrated record of earnings that substantially exceed the Commission-prescribed 11.25 per cent return.²⁰ For example, in 1997, the Commission suspended multiple interstate access tariffs where statistical analyses showed that the projections in those tariffs had resulted in systematic errors in rates, and where those errors were statistically significant.²¹

¹⁹ Additionally, the Part 36 and Part 69 cost studies of Illinois Consolidated reflect numerous unexplained anomalies that require suspension and further investigation. Illinois Consolidated has reported an inexplicable switched traffic sensitive category rate of return of *negative* 43.89 for 2005 after having reported a cumulative rate of return of 65.21 percent for these same services during the most recent 2003- 2004 monitoring period. It has increased its corporate operations expense by nearly 200 percent (i.e., from \$12,905,779 reported for 2004 in the NECA/USAC data released October 2005 to \$22,659,984 for 2005). There also appears to be an inexplicable increase to the local switching rate base from \$140,309 reported in 2003 to \$1,596,544 in 2005. In addition, while the change in local switching plant investment was minimal (from \$6,720,800 in 2003 to \$6,652,720 in 2005), depreciation expense for local switching has increased from \$114,515 in 2003 to \$359,515 in 2005.

²⁰ *See Represcribing the Authorized Rate of Return for Interstate Services of Local Exchange Carriers*, Order, 5 FCC Rcd. 7507 (1990), *recon.* 6 FCC Rcd. 7 193 (1 99 1) (“1990 ROR Represcription Order”). The Commission prescribed the authorized overall rate of return on investment of 11.25 per cent with certain buffer zones. *See also* 47 C.F.R. § 65.700. Specifically, rate of return ILECs are allowed to earn 0.40 percentage points over the prescribed return on each service category or 0.25 percentage points over the prescribed rate if the return is measured across the entire base.

²¹ *See 1997 Annual Access Tariff Filings*, CC Docket No. 97-149, Memorandum Opinion & Order, FCC 97-403, ¶¶ 19-21 (rel. Dec. 1, 1997) (“1997 Tariff Order”).

Most recently, after AT&T and other access customers pointed out that NECA had consistently earned returns in excess of the prescribed level over an extended period of time, the Commission suspended NECA's 2004 annual access tariffs, finding that "substantial questions of lawfulness exist that warrant further investigation" of the proposed rates.²² Following its investigation, the Commission found that -- particularly in light of NECA's prior reliance on a rate development methodology that had resulted in consistent overearnings -- NECA had failed to provide adequate information or explanations for its proposed 2004 access charges and the Commission was thus precluded from finding that those rates were just and reasonable.²³

In their current tariff filings, several rate-of-return ILECs that have exhibited the consistent pattern of overearnings which resulted in the Commission actions described above have nonetheless either maintained their current rate levels or , in some cases, have proposed significant rate *increases* of as much as 72 percent from their currently effective levels for

²² See *July 1, 2004 Annual Access Charge Tariff Filings*, WCB/Pricing File No. 04-18, Order, DA 04-1997 (WCB/Pricing. Div., rel. July 1, 2004) ("2004 Tariff Suspension Order") ¶¶ 2, 4, 10, citing AT&T Petition filed June 23, 2004, pp. 2-3.

²³ See *July 1, 2004 Annual Access Charge Tariff Filings*, WC Docket No. 04-372, Order Designating Issues, DA 04-3020 (WCB/Pricing, rel. Sept. 20, 2004) ("2004 ODI"); *July 1, 2004 Annual Access Charge Tariff Filings*, WC Docket No. 04-372, Memorandum Opinion and Order, FCC 04-277 (rel. Nov. 30, 2004) ("2004 Investigation Order"), ¶¶ 6-24.

Because the record on investigation was inadequate to prescribe just and reasonable rates, the Commission concluded that it could not prescribe NECA's rates for the 2004-2005 tariff year. See *2004 Investigation Order*, ¶ 25. It therefore permitted the filed rates to remain in effect, but ordered NECA to modify its earnings reporting procedures to permit better ongoing monitoring of its earnings levels throughout the 2005-2006 monitoring period. *Id.*, ¶¶ 26-32. It further held that, both in light of the original suspension and NECA's subsequent failure to justify those proposed charges, "[i]t would not be reasonable to give the 'deemed lawful' imprimatur" to those tariffs. *Id.*, ¶ 26. Therefore, as merely lawful rates, the NECA tariffs remained subject to potential formal complaints under Section 208 seeking refunds of overcharges if the rates resulted in overearnings for the monitoring period. *Id.*, ¶ 1.

service categories.²⁴ Another such carrier has proposed an insignificant decrease of just one percent from its current rate levels.²⁵ should suspend and investigate these LECs' tariffs.

AT&T has analyzed these carriers' past earning levels to determine whether their methodologies are biased towards producing a higher than authorized rate of return. That analysis shows that the amount by which these LECs have consistently overearned is *not* explained by random error. Rather, the overstatements are statistical outliers. Accordingly, consistent with Commission precedent, the Commission should suspend and investigate these LECs' tariffs.

To understand if the ILEC forecasts made during previous annual filings resulted in rates of return higher than the targeted 11.25 percent return, AT&T used a difference of means test, which the Commission has itself employed in other tariff review proceedings to identify "outliers" whose tariffs warrant further scrutiny.²⁶

Specifically, AT&T analyzed the difference between each carrier's actual rates of return and the authorized return of 11.25 percent. In the absence of some bias in the ILEC's rate development process, these differences should not statistically differ from zero. The test hypothesis is that the average difference between two means is zero.^{27,28} The t-statistic calculated

²⁴ These ILECs, all of which join in a tariff filed by John Stauralakis Incorporated ("JSI"), are Fort Mill Telephone Company, Illinois Consolidated Telephone Company, and Consolidated Communications of Fort Bend Company. The specific percentage increases by carriers in this group are shown in Exhibit 4, attached.

²⁵ That ILEC is Gallatin River Communications, which also joins in JSI's tariff filing. See Exhibit 3, p. 3 of 7, attached.

²⁶ See, e.g., 1997 Tariff Order Appendix B..

²⁷ The standard deviation of the differences, s_d , is calculated using the following equation:

$$s_d = \sqrt{\sum (d_i - D) / (n-1)} .$$

(Footnote continued on following page)

from the sample data can then be compared to the critical values of the one-tailed t-distribution at the 90 percent confidence level. If the t-statistic calculated in the foregoing manner exceeds a critical value, then there is only a 10 per cent likelihood that the true mean of the rates of return is 11.25 percent, the authorized earnings level. As shown in the charts included in Exhibit 3, separately evaluating each of the ILECs mentioned earlier, the t-statistic calculated for that carrier in every case exceeds these critical values. This discrepancy indicates that these ILECs have a systematic upward bias in their rate development process.

Accordingly, the Commission should suspend the tariffs of those LECs that have consistently earned returns in excess of the prescribed level over an extended period of time, investigate the underlying cause or causes of their persistent forecast errors, and determine whether a rate prescription is appropriate. Such action is especially imperative because otherwise these carriers' tariffs, which have been filed on a "streamlined" basis pursuant to Section 204(a)(3) of the Communications Act (47 U.S.C. § 204(a)(3)), will be "deemed lawful."

(Footnote continued from preceding page)

The corresponding standard deviation of the average of the differences, s_D , is calculated using the equation:

$$s_D = s_d / \sqrt{n}$$

The t-statistic is calculated using the formula $= D / s_D$. This statistic is compared to the statistical t-distribution with degrees of freedom equal to the number of observations minus 1

In that event, access customers may be foreclosed from recovering overcharges through the Section 208 formal complaint process.²⁹

CONCLUSION

For the reasons stated above, the Commission should reject the tariff filings listed in Appendix A or, in the alternative, investigate the proposed tariff revisions , suspend the proposed rates for the full five month statutory period, and impose an accounting order with respect to those charges.

Respectfully submitted,

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²⁹ See *ACS of Anchorage, Inc. v. FCC*, 290 F.3d 403 (D.C. Cir. 2002); accord, *Virgin Islands Tel. Co. v FCC*, . 04-1352, slip op. (D.C. Cir., April 11, 2006).

EXHIBIT 1

Exhibit 1

**Return Adjusted to Reflect NECA Projection
and Exit Effects**
(Dollars in Millions)

	Actual A/O	Projection	Actuals After Rate Projection	Exit Effects *	Actuals After Exit Adjustments
1. Revenue					
2. Average Schedule RRQ	\$442.106	-\$37.171	\$404.935	-\$29.215	\$375.720
3. Cost Company RRQ	\$125.112	\$1.345	\$126.457	-\$14.139	\$112.318
4. NECA Expense	\$285.829	\$26.904	\$312.733	-\$5.000	\$307.733
	\$5.160	\$1.822	\$6.982	\$0.000	\$6.982
5. Revenue less cost (5)=(1-2-3-4)					
6. Average PYCOS Rate Base			-\$41.237		-\$51.313
7. \$ Return included in RRQ @ 11.25%= .1125*6			\$486.680		486.057
8. Net revenue return RRQ =(7)-(5)			\$54.7515		\$54.6814
9. Actual Return = 8/6	14.15%		\$13.5145	2.78%	\$3.3684
					0.69%

* The DATA in these columns is taken from Transmittal No. 1129, Table 6.

(1) The returns assume that the PYCOS DATA IS PER Trans. 1129 COS-1(H). Note that this same rate base is used across the columns to ensure consistency across all of the columns.

EXHIBIT 2

Alltel Telephone Services Corporation

Exhibit 2A
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Summary of Special Access and DSL Revenue Requirements

Test Year	a	b	c	d=b-c	e	f=d-e
2006 Annual Filing	COE Cat 4.11 DSL Investment	Total SA Rev Rqmt Post MAG	COE Cat 4.11 DSL Rev Rqmt	Difference Remaining for SA Services	SA Revenues as filed	Amount of SA Services Subsidizing DSL Costs
Alltel Study Areas						
Alabama	\$4,440,544	\$2,097,784	\$1,579,663	\$518,121	\$748,374	(\$230,253)
Georgia	\$82,004,091	\$34,700,579	\$22,041,402	\$12,659,177	\$13,320,795	(\$661,618)
Kentucky	\$7,472,959	\$2,522,196	\$2,195,246	\$326,950	\$1,131,435	(\$804,485)
Mississippi	\$919,646	\$423,651	\$349,031	\$74,620	\$168,077	(\$93,457)
North Carolina	\$43,149,238	\$15,105,744	\$10,592,110	\$4,513,634	\$5,724,995	(\$1,211,361)
New York	\$13,947,025	\$6,867,660	\$4,517,890	\$2,349,770	\$4,477,772	(\$2,128,002)
Oklahoma	\$2,828,874	\$1,979,446	\$956,313	\$1,023,133	\$1,193,251	(\$170,118)
Pennsylvania	\$32,107,202	\$14,712,839	\$9,414,860	\$5,297,979	\$6,591,016	(\$1,293,037)
South Carolina	\$10,817,335	\$3,689,086	\$2,674,132	\$1,014,954	\$1,231,604	(\$216,650)
Sugarland	\$11,915,556	\$6,869,987	\$3,339,857	\$3,530,130	\$3,819,227	(\$289,097)
Western Reserve	\$31,946,277	\$14,313,440	\$9,070,412	\$5,243,028	\$7,320,636	(\$2,077,608)
Total	\$241,548,747	\$103,282,412	\$66,730,915	\$36,551,497	\$45,727,182	(\$9,175,685)

Alltel-Alabama
Estimation of DSL Costs

Exhibit 2A
Page 2 of 12

Calculation/Source		A		B	
		A	B	Line	
DSL Revenue Requirement:					
Telephone Plant in Service (TPIS) Investment DSL Percent of Special Access (SA) Investment	Vol 2, COE.411DSL L1A/L1B	Vol 2, COE & CWF Tot	1 2		
					\$5,897,019
General Support Facilities (GSF) Investment Total DSL TPIS Investment	L3B*L2A L1A+L3A	Vol 2, GSF Tot	3 4	DSL GSF Inv	Special Access (GSF Inv) \$208,004
					\$156,630 \$4,597,174
SA Revenue Requirement SA TPIS Annual Carrying Charge Factor	Vol 2, REVREQ Vol 2, AC2001 L5A/L6A		5 6 7	Annual Carrying Charge Factor	
					\$2,097,784 \$6,105,023 34.36%
Estimated DSL Revenue Requirement		L4A*L7A	8		\$1,579,663
DSL Revenues:					
Total SA Rev Rqmt post MAG Proposed SA Revenues	Vol 5, P10, L8+L12a Vol 5, P10, L13 & P11		9 10		\$2,097,784 \$748,374
	DSL & Other Services Revenues		L9A-L10A	11	\$1,349,410
Amount of Special Access Services subsidizing DSL Costs		L8A-L11A	12		\$230,253

Source: Alltel 2006 Annual Filing Cost Support, Transmittal No. 165
Volume 2, Prospective Costs and Volume 5, Rate Development

Alltel-Georgia Properties
Estimation of DSL Costs

Exhibit 2A
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Calculation/Source		A		B	
		A		B	
		Line		Special Access (COE & CWF Inv)	
				COE Cat 4.11 DSL Inv	
DSL Revenue Requirement:					
Telephone Plant in Service (TPIS) Investment	Vol 2, COE.411DSL	Vol 2, COE & CWF Tot	1	\$82,004,091	\$128,545,997
DSL Percent of Special Access (SA) Investment	L1A/L1B		2	63.79%	
General Support Facilities (GSF) Investment	L3B*L2A	Vol 2, GSF Tot	3	\$4,622,615	\$7,246,207
Total DSL TPIS Investment	L1A+L3A		4	\$86,626,706	
SA Revenue Requirement	Vol 2, REVREQ		5		
SA TPIS	Vol 2, AC2001		6	\$34,557,376	
Annual Carrying Charge Factor	L5A/L6A		7	\$135,816,754	
				25.44%	
Estimated DSL Revenue Requirement		L4A*L7A	8	\$22,041,402	
DSL Revenues:					
Total SA Rev Rqmt post MAG	Vol 5, P10, L8+L12a		9	\$34,700,579	
Proposed SA Revenues	Vol 5, P10, L13 & P11		10	\$13,320,795	
DSL & Other Services Revenues		L9A-L10A	11	\$21,379,784	
Amount of Special Access Services subsidizing DSL Costs		L8A-L11A	12	\$661,618	

Source: Alltel 2006 Annual Filing Cost Support, Transmittal No. 165
Volume 2, Prospective Costs and Volume 5, Rate Development

Alltel-Kentucky
Estimation of DSL Costs

Exhibit 2A
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Calculation/Source		A		B	
		A		B	
		COE Cat 4.11		Special Access	
		DSL Inv		(COE & CWF Inv)	
		Line			
DSL Revenue Requirement:					
Telephone Plant in Service (TPIS) Investment DSL Percent of Special Access (SA) Investment	Vol 2, COE 411DSL L1A/L1B	Vol 2, COE & CWF Tot	1	\$7,472,959	\$8,581,221
			2	87.09%	
General Support Facilities (GSF) Investment Total DSL TPIS Investment	L3B*L2A L1A+L3A	Vol 2, GSF Tot	3	\$490,403	\$563,131
			4	\$7,963,362	
SA Revenue Requirement SA TPIS Annual Carrying Charge Factor	Vol 2, REVREQ Vol 2, AC2001 L5A/L6A			Annual Carrying	
				Charge Factor	
			5	\$2,520,807	
			6	\$9,144,351	
			7	27.57%	
Estimated DSL Revenue Requirement		L4A*L7A	8	\$2,195,246	
DSL Revenues:					
Total SA Rev Rqmt post MAG	Vol 5, P10, L8+L12a		9	\$2,522,196	
Proposed SA Revenues	Vol 5, P10, L13 & P11		10	\$1,131,435	
DSL & Other Services Revenues		L9A-L10A	11	\$1,390,761	
Amount of Special Access Services subsidizing		L8A-L11A	12	\$804,485	
DSL Costs					

Source: Alltel 2006 Annual Filing Cost Support, Transmittal No. 165
Volume 2, Prospective Costs and Volume 5, Rate Development

**AltTel-Mississippi
Estimation of DSL Costs**

**Exhibit 2A
Page 5 of 12**

Calculation/Source		A		B	
		A	B	Line	
DSL Revenue Requirement:					
Telephone Plant in Service (TPIS) Investment DSL Percent of Special Access (SA) Investment	Vol 2, COE 411DSL	Vol 2, COE & CWF Tot	1		
	L1A/L1B		2		
					\$919,646 82.41% \$1,115,906
General Support Facilities (GSF) Investment Total DSL TPIS Investment	L3B*L2A	Vol 2, GSF Tot	3		
	L1A+L3A		4		
					DSL Special Access GSF Inv (GSF Inv) \$52,397 \$43,182 \$962,828
SA Revenue Requirement SA TPIS Annual Carrying Charge Factor	Vol 2, REVREQ		5		
	Vol 2, AC2001		6		
	L5A/L6A		7		
					Annual Carrying Charge Factor \$423,651 \$1,168,671 36.25%
Estimated DSL Revenue Requirement		L4A*L7A	8		\$349,031
DSL Revenues:					
Total SA Rev Rqmt post MAG	Vol 5, P10, L8+L12a		9		\$423,651
Proposed SA Revenues	Vol 5, P10, L13 & P11		10		\$168,077
DSL & Other Services Revenues		L9A-L10A	11		\$255,574
Amount of Special Access Services subsidizing DSL Costs		L8A-L11A	12		\$93,457

Source: AltTel 2006 Annual Filing Cost Support, Transmittal No. 165
Volume 2, Prospective Costs and Volume 5, Rate Development

Alitel-New York
Estimation of DSL Costs

Exhibit 2A
Page 6 of 12

Calculation/Source		A		B	
		A		B	
		Line			
		COE Cat 4.11		Special Access	
		DSL Inv		(COE & CWF Inv)	
DSL Revenue Requirement:					
Telephone Plant in Service (TPIS) Investment DSL Percent of Special Access (SA) Investment	Vol 2, COE 411DSL	Vol 2, COE & CWF Tot	1	\$13,947,025	\$20,861,310
	L1A/L1B		2	66.86%	
General Support Facilities (GSF) Investment Total DSL TPIS Investment	L3B*L2A	Vol 2, GSF Tot	3	\$1,434,480	\$2,145,628
	L1A+L3A		4	\$15,381,505	
SA Revenue Requirement SA TPIS	Vol 2, REVREQ		5	\$6,757,650	
	Vol 2, AC2001		6	\$23,006,939	
Annual Carrying Charge Factor	L5A/L6A		7	29.37%	
Estimated DSL Revenue Requirement		L4A*L7A	8	\$4,517,890	
DSL Revenues:					
Total SA Rev Rqmt post MAG	Vol 5, P10, L8+L12a		9	\$6,867,660	
Proposed SA Revenues	Vol 5, P10, L13 & P11		10	\$4,477,772	
DSL & Other Services Revenues		L9A-L10A	11	\$2,389,888	
Amount of Special Access Services subsidizing					
DSL Costs		L8A-L11A	12	\$2,128,002	

Source: Alitel 2006 Annual Filing Cost Support, Transmittal No. 165
Volume 2, Prospective Costs and Volume 5, Rate Development

Source: Alltel 2006 Annual Filing Cost Support, Transmittal No. 165
Volume 2, Prospective Costs and Volume 5, Rate Development

**Alltel-Pennsylvania
Estimation of DSL Costs**

**Exhibit 2A
Page 9 of 12**

Calculation/Source		A		B	
		A	B	Line	
DSL Revenue Requirement:					
Telephone Plant in Service (TPIS) Investment	Vol 2, COE 411DSL	Vol 2, COE & CWF Tot	1		
DSL Percent of Special Access (SA) Investment	L1A/L1B		2		
					\$32,107,202
					64.86%
					\$49,500,505
General Support Facilities (GSF) Investment	L3B*L2A	Vol 2, GSF Tot	3		
Total DSL TPIS Investment	L1A+L3A		4		
					\$3,245,270
					\$35,352,472
					\$5,003,317
SA Revenue Requirement	Vol 2, REVREQ		5		
SA TPIS	Vol 2, AC2001		6		
Annual Carrying Charge Factor	L5A/L6A		7		
					26.63%
					\$14,515,429
					\$54,504,934
Estimated DSL Revenue Requirement					
	L4A*L7A		8		\$9,414,860
DSL Revenues:					
Total SA Rev Rqmt post MAG	Vol 5, P10, L8+L12a		9		\$14,712,839
Proposed SA Revenues	Vol 5, P10, L13 & P11		10		\$6,591,016
DSL & Other Services Revenues					
	L9A-L10A		11		\$8,121,823
Amount of Special Access Services subsidizing					
DSL Costs	L8A-L11A		12		\$1,293,037

Source: Alltel 2006 Annual Filing Cost Support, Transmittal No. 165
Volume 2, Prospective Costs and Volume 5, Rate Development

Calculation/Source		A		B	
A		B		Line	
		COE Cat 4.11 DSL Inv		Special Access (COE & CWF Inv)	
DSL Revenue Requirement:					
Telephone Plant in Service (TPIS) Investment DSL Percent of Special Access (SA) Investment	Vol 2, COE.411DSL L1A/L1B	Vol 2, COE & CWF Tot	1 2	\$10,817,335 73.68%	\$14,681,202
General Support Facilities (GSF) Investment Total DSL TPIS Investment	L3B*L2A L1A+L3A	Vol 2, GSF Tot	3 4	DSL GSF Inv \$403,207 \$11,220,542	Special Access (GSF Inv) \$547,229
SA Revenue Requirement SA TPIS Annual Carrying Charge Factor	Vol 2, REVREQ Vol 2, AC2001 L5A/L6A		5 6 7	Annual Carrying Charge Factor \$3,629,311 \$15,228,432 23.83%	
Estimated DSL Revenue Requirement		L4A*L7A	8	\$2,674,132	
DSL Revenues:					
Total SA Rev Rqmt post MAG Proposed SA Revenues	Vol 5, P10, L8+L12a Vol 5, P10, L13 & P11		9 10	\$3,689,086 \$1,231,604	
DSL & Other Services Revenues		L9A-L10A	11	\$2,457,482	
Amount of Special Access Services subsidizing DSL Costs					
	L8A-L11A		12	\$216,650	

**AltTel-Sugarland
Estimation of DSL Costs**

**Exhibit 2A
Page 11 of 12**

Calculation/Source		A		B	
		COE Cat 4.11		Special Access	
		DSL Inv		(COE & CWF Inv)	
DSL Revenue Requirement:					
		Line			
		A		B	
Telephone Plant in Service (TPIS) Investment	Vol 2, COE 4.11 DSL	Vol 2, COE & CWF Tot	1	\$11,915,556	\$23,999,849
	L1A/L1B		2	49.65%	
General Support Facilities (GSF) Investment	L3B*L2A	Vol 2, GSF Tot	3	\$1,475,586	\$2,972,067
	L1A+L3A		4	\$13,391,142	
Total DSL TPIS Investment					
SA Revenue Requirement	Vol 2, REVREQ		5	\$6,735,029	
	Vol 2, AC2001		6	\$27,004,072	
Annual Carrying Charge Factor	L5A/L6A		7	24.94%	
Annual Carrying Charge Factor					
Estimated DSL Revenue Requirement		L4A*L7A	8	\$3,339,857	
DSL Revenues:					
Total SA Rev Rqmt post MAG	Vol 5, P10, L8+L12a		9	\$6,869,987	
Proposed SA Revenues	Vol 5, P10, L13 & P11		10	\$3,819,227	
DSL & Other Services Revenues		L9A-L10A	11	\$3,050,760	
Amount of Special Access Services subsidizing DSL Costs					
	L8A-L11A		12	\$289,097	

Source: AltTel 2006 Annual Filing Cost Support, Transmittal No. 165
Volume 2, Prospective Costs and Volume 5, Rate Development

**Alltel-Western Reserve
Estimation of DSL Costs**

**Exhibit 2A
Page 12 of 12**

Calculation/Source		A		B	
		A		B	
		Line		Special Access (COE & CWF Inv)	
				COE Cat 4.11 DSL Inv	
DSL Revenue Requirement:					
Telephone Plant in Service (TPIS) Investment DSL Percent of Special Access (SA) Investment	Vol 2, COE.411DSL L1A/L1B	Vol 2, COE & CWF Tot	1	\$31,946,277	\$49,780,876
			2	64.17%	
General Support Facilities (GSF) Investment Total DSL TPIS Investment	L3B*L2A L1A+L3A	Vol 2, GSF Tot	3	DSL GSF Inv	Special Access (GSF Inv)
			4	\$2,683,470 \$34,629,747	\$4,181,567
SA Revenue Requirement SA TPIS Annual Carrying Charge Factor	Vol 2, REVREQ Vol 2, AC2001 L5A/L6A		5	Annual Carrying Charge Factor	
			6	\$14,134,136 \$53,962,442	
			7	26.19%	
Estimated DSL Revenue Requirement		L4A*L7A	8	\$9,070,412	
DSL Revenues:					
Total SA Rev Rqmt post MAG	Vol 5, P10, L8+L12a		9	\$14,313,440	
Proposed SA Revenues	Vol 5, P10, L13 & P11		10	\$7,320,636	
DSL & Other Services Revenues		L9A-L10A	11	\$6,992,804	
Amount of Special Access Services subsidizing DSL Costs		L8A-L11A	12	\$2,077,608	

Source: Alltel 2006 Annual Filing Cost Support, Transmittal No. 165
Volume 2, Prospective Costs and Volume 5, Rate Development

Consolidated Communications Telephone Services Corporation
Summary of Special Access and DSL Revenue Requirements

Exhibit 2B
Page 1 of 3

Test Year	a	b	c	d=b-c	e	f=d-e
2006 Annual Filing						
Consolidated Communications	COE Cat 4.11 & Cat 4.12 DSL Investment	Total SA Rev Rqmt Post MAG	COE Cat 4.11 & Cat 4.12 DSL Rev Rqmt	Difference Remaining for SA Services	SA Revenues as filed	Amount of SA Services Subsidizing DSL Costs
Fort Bend	\$4,269,581	\$1,740,017	\$1,228,788	\$511,229	\$1,194,596	(\$683,367)
Texas	\$10,444,427	\$6,184,005	\$2,958,594	\$3,225,411	\$4,537,500	(\$1,312,089)
Total	\$14,714,008	\$7,924,022	\$4,187,382	\$3,736,640	\$5,732,096	(\$1,995,456)

Consolidated Communications-Fort Bend
Estimation of DSL Costs

Exhibit 2B
Page 2 of 3

Calculation/Source		A		B	
		A		B	
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Source: Consolidated Communications Companies Transmittal No. 12, Filed June 16, 2006
Prospective Part 69 Cost Studies and Attachment #9

Consolidated Communications-Texas
Estimation of DSL Costs

Exhibit 2B
Page 3 of 3

Calculation/Source			A		B	
			COE Cat 4.11 & Cat 4.12		Special Access & Wideband (COE & CWF Inv)	
			A	DSL Inv		
Line						
DSL Revenue Requirement:						
Telephone Plant in Service (TPIS) Investment	FCC P69, WB, P6	FCC P69, SA & WB, P6	1	\$10,444,427	\$21,628,853	
DSL Percent of Special Access (SA) Investment	L1A/L1B		2	48.29%		
General Support Facilities (GSF) Investment	L3B*L2A	FCC P69, SA & WB, P6	3	\$2,183,324	\$4,521,339	
Total DSL TPIS Investment	L1A+L3A		4	\$12,627,751		
SA Revenue Requirement	Attachment #9, P1, L21		5	\$6,126,807		
SA TPIS	Attachment #9, P1, L1		6	\$26,150,192		
Annual Carrying Charge Factor	L5A/L6A		7	23.43%		
Estimated DSL Revenue Requirement			L4A*L7A	\$2,958,594		
DSL Revenues:						
Total SA Rev Rqmt post MAG	Attachment #9, P1, L24		9	\$6,184,005		
Proposed SA Revenues	Attachment #9, P6 of 7		10	\$4,537,500		
DSL & Other Services Revenues			L9A-L10A	\$1,646,505		
Amount of Special Access Services subsidizing DSL Costs			L8A-L11A	\$1,312,089		

Source: Consolidated Communications Companies Transmittal No. 12, Filed June 16, 2006
Prospective Part 69 Cost Studies and Attachment #9

Alltel High Cap Special Access Demand and Rate Comparisons
2006 Annual Filing, June 16, 2006

Exhibit 2C

		04-05 Demand			06-07 Demand			Percent Change		
		CT	CMF	CMT	CT	CMF	CMT	CT	CMF	CMT
AL	Hi Cap 1.544	825	6,441	827	1,747	13,324	1,717	111.76%	106.86%	107.62%
	Hi Cap 44.736	12	91	12	45	283	45	275.00%	210.99%	275.00%
AR	Hi Cap 1.544	10,339	170,236	8,096	15,689	287,671	13,631	51.75%	68.98%	68.37%
	Hi Cap 44.736	230	2,353	192	371	6,786	334	61.30%	188.40%	73.96%
FL	Hi Cap 1.544	4,859	58,332	4,109	7,656	83,992	6,408	57.56%	43.99%	55.95%
	Hi Cap 44.736	70	2,663	152	374	5,147	311	434.29%	93.28%	104.61%
GA	Hi Cap 1.544	25,823	266,953	21,867	44,722	447,372	38,552	73.19%	67.58%	76.30%
	Hi Cap 44.736	802	8,643	523	1,743	21,113	1,485	117.33%	144.28%	183.94%
KY	Hi Cap 1.544	1,451	6,455	1,372	1,607	6,714	1,510	10.75%	4.01%	10.06%
	Hi Cap 44.736	22	49	32	60	243	70	172.73%	395.92%	118.75%
MS	Hi Cap 1.544	452	1,984	452	372	2,208	372	-17.70%	11.29%	-17.70%
	Hi Cap 44.736	3	-	-	12	15	12	300.00%	100.00%	100.00%
MO	Hi Cap 1.544	3,775	33,901	3,692	4,851	46,638	4,665	28.50%	37.57%	26.35%
	Hi Cap 44.736	12	161	24	55	855	76	358.33%	431.06%	216.67%
NY	Hi Cap 1.544	5,676	50,939	5,254	9,628	70,526	8,571	69.63%	38.45%	63.13%
	Hi Cap 44.736	68	909	84	130	2,615	237	91.18%	187.68%	182.14%
NC	Hi Cap 1.544	16,532	90,729	14,062	26,672	134,188	19,681	61.34%	47.90%	39.96%
	Hi Cap 44.736	215	1,161	272	592	2,714	573	175.35%	133.76%	110.66%
OK	Hi Cap 1.544	2,450	22,078	2,322	5,304	56,138	4,656	116.49%	154.27%	100.52%
	Hi Cap 44.736	8	-	-	36	636	12	350.00%	100.00%	100.00%
PA	Hi Cap 1.544	16,157	114,950	14,691	23,815	157,298	21,402	47.40%	36.84%	45.68%
	Hi Cap 44.736	210	2,137	191	328	3,557	342	56.19%	66.45%	79.06%
SC	Hi Cap 1.544	3,701	9,431	3,294	5,823	13,474	4,690	57.34%	42.87%	42.38%
	Hi Cap 44.736	120	228	132	196	457	240	63.33%	100.44%	81.82%
SL	Hi Cap 1.544	11,724	18,967	9,931	17,293	30,415	13,795	47.50%	60.36%	38.91%
	Hi Cap 44.736	238	324	173	316	640	180	32.77%	97.53%	4.05%
TX	Hi Cap 1.544	1,921	17,866	1,845	3,500	32,542	3,408	82.20%	82.14%	84.72%
	Hi Cap 44.736	28	191	28	45	259	45	60.71%	35.60%	60.71%
WR	Hi Cap 1.544	17,294	100,528	17,278	23,650	139,262	21,465	36.75%	38.53%	24.23%
	Hi Cap 44.736	545	3,809	784	750	6,123	1,242	37.61%	60.75%	58.42%

Source:

04/05 Demand: Alltel Transmittal No. 138, Volume 5, Page 10

06/07 Demand: Alltel Transmittal No. 165, Volume 5, Page 11

EXHIBIT 3

Fort Mill Switched

Period	Traffic Sensitive Return	Target	Differences	Diff-Avg	(Diff-Avg)^2
1999	44.42%	11.25%	33.17%	0.223171	0.049805487
2000	37.96%	11.25%	26.71%	0.158571	0.025144898
2001	19.39%	11.25%	8.14%	-0.027129	0.000735959
2002	14.57%	11.25%	3.32%	-0.075329	0.005674394
2003	26.72%	11.25%	15.47%	0.046171	0.002131801
2004	11.66%	11.25%	0.41%	-0.104429	0.010905327
2005	0.00%	11.25%	-11.25%	-0.221029	0.048853629
count			7		0.143251494

# < 0	1
Ave. Difference	10.85%

Standard Deviations of the differences	0.154516177
of the average difference	0.058401626

t - stat	1.858314224	Pr(T>=t) 5.62%
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LEVEL OF SIGNIFICANCE	
t critical*	1.939
t critical*	1.439
	5%
	10%

The t critical values are found using EXCEL's tdist function and its Tools-Goal Seek feature.

Illinois Consolidated Switched

Period	Traffic Sensitive Return	Target	Differences	Diff-Avg	(Diff-Avg) ²
1999	19.11%	11.25%	7.86%	-0.037517	0.0014075
2000	5.41%	11.25%	-5.84%	-0.174517	0.030456067
2001	23.92%	11.25%	12.67%	0.010583	0.000112007
2002	23.92%	11.25%	12.67%	0.010583	0.000112007
2003	46.80%	11.25%	35.55%	0.239383	0.05730438
2004	18.01%	11.25%	6.76%	-0.048517	0.002353867
2005	***				

count	6
# < 0	1
Ave. Difference	11.61%

Standard Deviations of the differences	0.135459092
of the average difference	0.055300943

t - stat	2.099723092	Pr(T>=t) 4.49%
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	LEVEL OF SIGNIFICANCE
t critical*	2.002
t critical*	1.473
	5%
	10%

The t critical values are found using EXCEL's tdist function and its Tools-Goal Seek feature.

2005 rate of return, -43%, not used as explained in the petition.

Gallatin River Switched

Period	Traffic Sensitive Return	Target	Differences	Diff-Avg	(Diff-Avg) ²
2000	10.95%	11.25%	-0.30%	-0.048566	0.002358699
2001	25.46%	11.25%	14.21%	0.096534	0.009318728
2002	19.15%	11.25%	7.90%	0.033434	0.001117803
2003	14.78%	11.25%	3.53%	-0.010266	0.0001054
2004	11.71%	11.25%	0.46%	-0.040966	0.001678249
2005	12.79%	11.25%	1.54%	-0.030168	0.000910096
count			6		0.015488976
# < 0			1		
Ave. Difference			4.56%		

Standard Deviations of the differences	0.05565784
of the average difference	0.022722218

t - stat	2.005369362	Pr(T>=t)	5.06%
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		LEVEL OF SIGNIFICANCE
t critical*	2.002	5%
t critical*	1.473	10%

The t critical values are found using EXCEL's tdist function and its Tools-Goal Seek feature.

Fort Bend Specials

Period	Traffic Sensitive Return	Target	Differences	Diff-Avg	(Diff-Avg)^2
2001	8.58%	11.25%	-2.67%	-0.80172	0.642755288
2002	22.77%	11.25%	11.52%	-0.65982	0.435362704
2003	126.66%	11.25%	115.41%	0.37908	0.14370149
2004	126.11%	11.25%	114.86%	0.37358	0.139561863
2005	159.64%	11.25%	148.39%	0.708881	0.502512021

count	5
# < 0	1
Ave. Difference	77.50%

Standard Deviations	
of the differences	0.6826224
of the average difference	0.305278018

t - stat	2.538735709	Pr(T>=t)	3.20%
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		LEVEL OF SIGNIFICANCE
t critical*	2.122	5%
t critical*	1.533	10%

The t critical values are found using EXCEL's tdist function and its Tools-Goal Seek feature.

Fort Mill Specials

Period	Traffic Sensitive Return	Target	Differences	Diff-Avg	(Diff-Avg)^2
1999	29.95%	11.25%	18.70%	0.115574	0.013357456
2000	8.14%	11.25%	-3.11%	-0.102526	0.010511486
2001	9.47%	11.25%	-1.78%	-0.089226	0.007961197
2002	20.00%	11.25%	8.75%	0.016074	0.000258388
2003	30.36%	11.25%	19.11%	0.119674	0.014321976
2004	16.33%	11.25%	5.08%	-0.020626	0.000425413
2005	14.50%	11.25%	3.25%	-0.038947	0.00151685

count	7
# < 0	2
Ave. Difference	7.14%

Standard Deviations of the differences	0.089770788
of the average difference	0.033930169

t - stat	2.105074726	Pr(T>=t) 4.00%
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LEVEL OF SIGNIFICANCE	
t critical*	1.939
t critical*	1.439
	5%
	10%

The t critical values are found using EXCEL's tdist function and its Tools-Goal Seek feature.

**Demonstration of Projection Bias
Rate of Return Companies
Traffic Sensitive Switched Access**

A Company	t-test				F Significant Outlier
	B Average Rate of Return	C Standard Deviation of the Average Rate of Return	D Calculated t-statistic	E Critical t-statistic at 90% Confidence Level	
Fort Mill	22.10%	5.84%	1.8583	1.4390	YES
Illinois Consolidated*	22.86%	5.53%	2.0997	1.4728	YES
Gallatin River	15.81%	2.27%	2.0054	1.4728	YES

**Demonstration of Projection Bias
Rate of Return Companies
Special Access**

A Company	t-test				
	B Average Rate of Return	C Standard Deviation of the Average Rate of Return	D Calculated t-statistic	E Critical t-statistic at 90% Confidence Level	F Significant Outlier
Fort Bend	88.75%	30.53%	2.5387	1.4390	YES
Fort Mill	18.39%	3.39%	2.1051	1.4728	YES

EXHIBIT 4

Rate of Return Carriers That Have Consistently Over Earned That have Filed Increases or Minimal Decreases

Specials		
Company Name	2006 Rate Change	References
Fort Mill	19%	2006 TRP, RTE-2, Row 130, (Column B/Column D) -1
Fort Bend	7%	2006 TRP, RTE-2, Row 130, (Column B/Column D) -1

Switched		
Company Name	2006 Rate Change	References
Fort Mill	70%	2006 TRP, RTE-2, (Sum of Row 140 + Row 150 + Row 160 + Row 170) (Column B/Column D) -1
Illinois Consolidated	54%	2006 TRP, RTE-2, (Sum of Row 140 + Row 150 + Row 160 + Row 170) (Column B/Column D) -1
Gallatin River	-1%	2006 TRP, RTE-2, (Sum of Row 140 + Row 150 + Row 160 + Row 170) (Column B/Column D) -1