

**Federal Communications Commission Response to
United States House of Representatives
Committee on Energy and Commerce
Universal Service Fund Data Request of April 1, 2009**

**Part 3
Largest Per-Line Subsidies, by Study Area**

Study Areas with the Highest Support per Line in 2008

Rank	Incumbent ETC	State	Holding Company	Support	Lines (average ¹)	Support per Line
1	BEAVER CREEK TIMBRLN	Washington	Beaver Creek Telephone Company	\$454,524	27	\$16,834
2	BORDER TO BORDER	Texas	Border to Border Communications, Inc.	\$1,883,082	139	\$13,596
3	WESTGATE COMM. LLC dba WEAVTEL	Washington	Westgate Communications LLC	\$188,382	14	\$13,456
4	SANDWICH ISLES COMM.	Hawaii	Sandwich Isles Communications, Inc.	\$26,372,952	1,967	\$13,408
5	ADAK TEL UTILITY	Alaska	Adak Eagle Enterprises, LLC	\$1,967,538	198	\$9,937
6	ALLBAND COMM. COOP.	Michigan	Allband Communications Cooperative	\$745,140	76	\$9,804
7	ACCIPITER COMM.	Arizona	Accipiter Communications, Inc.	\$2,242,602	276	\$8,140
8	TERRAL TEL CO	Oklahoma	Terral Telephone Company	\$1,685,103	261	\$6,469
9	S. CENTRAL TEL - OK	Oklahoma	South Central Telephone Association, Inc.	\$1,708,206	316	\$5,406
10	SOUTH PARK TEL. CO.	Colorado	SSF Partners, LLC	\$990,807	210	\$4,729

¹ The average number of lines in 2008 was calculated by averaging the number of lines at the end of years 2007 and 2008. Because year-end 2008 line counts have not yet been filed with the Commission, the number of lines at the end of 2008 was estimated using a straight-line projection of data from 2004 to 2007. WESTGATE COMM. LLC dba WEAVTEL filed line count data beginning with year end 2007, so that number was used.

Competitive ETCs in Study Areas with the Highest Support per Line in 2008

Rank	Incumbent ETC	Competitive ETC	Competitive ETC Support ¹	CETC Lines ²	Support per Line ³
4	SANDWICH ISLES COMM.	NPCR, Inc.	\$14,042,097	913	\$15,380
		Coral Wireless dba Mobi PCS	\$19,363,416	1,289	\$15,022
			<u>\$33,405,513</u>	<u>2,202</u>	
8	TERRAL TEL CO	United States Cellular Corporation	\$532,977	127	\$4,197
				<u>\$532,977</u>	
9	S. CENTRAL TEL - OK	Cellular Network Partnership	\$651,272	185	\$3,520
				<u>\$651,272</u>	
10	SOUTH PARK TEL. CO.	Western Wireless	\$3,244	1	\$3,244
				<u>\$3,244</u>	

¹ Source: USAC data. Federal Communications Commission staff was unable to independently validate these data.

² Federal Communications Commission staff estimates of average annual competitive ETC lines.

³ The identical support rule (47 C.F.R. 54.307) does not guarantee that the incumbent and competitive ETCs will receive the same total high cost support per line within any period of time. In many cases per-line support is calculated at a level of aggregation below the study area. For example, per line support rates for both Interstate Access and Interstate Common Line Support are calculated separately for residential and multi-line business lines within a study area. If the lines of the incumbent and competitor(s) are allocated differently across classes of lines, per-line support from these funding mechanisms will be unequal at the study-area level. Similarly, High-Cost Model (HCM) Support is calculated for each wire center rather than the study area as a whole. It is likely that the lines of the incumbent and competitor(s) are allocated across wire centers in different proportions, leading to a condition where per-line HCM support is unequal at the study area level. Even in a case where the competitor and incumbent had their eligible lines allocated identically across different classes of lines or the parts of a study area, per-line support may be unequal since current support for either carrier may be adjusted based on revised data for prior periods.

Study Areas with the Highest Support per Line in 2007

Rank	Incumbent ETC	State	Holding Company	Support	Lines (average¹)	Support per Line
1	WESTGATE COMM. LLC dba WEAVTEL	Washington	Westgate Communications LLC	\$232,692	14	\$16,621
2	BEAVER CREEK TIMBRLN	Washington	Beaver Creek Telephone Company	\$396,126	27	\$14,671
3	SANDWICH ISLES COMM.	Hawaii	Sandwich Isles Communications, Inc.	\$21,818,766	1,709	\$12,771
4	BORDER TO BORDER	Texas	Border to Border Communications, Inc.	\$1,382,160	139	\$9,979
5	ADAK TEL UTILITY	Alaska	Adak Eagle Enterprises, LLC	\$1,787,926	194	\$9,240
6	ALLBAND COMM. COOP.	Michigan	Allband Communications Cooperative	\$267,394	40	\$6,685
7	TERRAL TEL CO	Oklahoma	Terral Telephone Company	\$1,721,598	273	\$6,306
8	ACCIPITER COMM.	Arizona	Accipiter Communications, Inc.	\$1,476,648	235	\$6,284
9	SOUTH PARK TEL. CO.	Colorado	SSF Partners, LLC	\$920,052	207	\$4,445
10	BEEHIVE TEL CO - UT	Utah	Beehive Telephone Companies	\$4,349,802	993	\$4,380

¹ The average number of lines in 2007 was calculated by averaging the number of lines at the end of years 2006 and 2007. WESTGATE COMM. LLC dba WEAVTEL filed line count data beginning with year end 2007, so that number was used.

Competitive ETCs in Study Areas with the Highest Support per Line in 2007

Rank	Incumbent ETC	Competitive ETC	Competitive ETC Support ¹	CETC Lines ²	Support per Line ³
3	SANDWICH ISLES COMM.	NPCR, Inc.	\$19,594,308	1,304	\$15,026
		Coral Wireless dba Mobi PCS	\$7,890,117	653	\$12,083
			\$27,484,425	1,957	
7	TERRAL TEL CO	United States Cellular Corporation	\$824,889	133	\$6,202
			\$824,889	133	

¹ Source: USAC data. Federal Communications Commission staff was unable to independently validate these data.

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Study Areas with the Highest Support per Line in 2006

Rank	Incumbent ETC	State	Holding Company	Support	Lines (average¹)	Support per Line
1	SANDWICH ISLES COMM.	Hawaii	Sandwich Isles Communications, Inc.	\$20,337,885	1,505	\$13,514
2	BORDER TO BORDER	Texas	Border to Border Communications, Inc.	\$1,161,846	128	\$9,077
3	TERRAL TEL CO	Oklahoma	Terral Telephone Company	\$2,002,704	280	\$7,153
4	ADAK TEL UTILITY	Alaska	Adak Eagle Enterprises, LLC	\$1,347,866	190	\$7,094
5	ACCIPITER COMM.	Arizona	Accipiter Communications, Inc.	\$1,414,116	203	\$6,966
6	SOUTH PARK TEL. CO.	Colorado	SSF Partners, LLC	\$814,716	209	\$3,908
7	BEEHIVE TEL CO - NV	Nevada	Beehive Telephone Companies	\$572,580	165	\$3,470
8	ELSIE COMM., INC.	Nebraska	Newcastle Holdings, Inc.	\$651,240	214	\$3,043
9	MESCALERO APACHE	New Mexico	Mescalero Apache Telecom, Inc.	\$3,542,031	1,209	\$2,931
10	SUMMIT TEL & TEL -AK	Alaska	Remote Control, Inc.	\$892,098	305	\$2,925

¹ The average number of lines in 2006 was calculated by averaging the number of lines at the end of years 2005 and 2006.

Competitive ETCs in Study Areas with the Highest Support per Line in 2006

Rank	Incumbent ETC	Competitive ETC	Competitive ETC Support ¹	CETC Lines ²	Support per Line ³
1	SANDWICH ISLES COMM.	NPCR, INC.	\$18,005,605	1,222	\$14,735
			\$18,005,605	1,222	
3	TERRAL TEL CO	UNITED STATES CELLULAR CORPORATION	\$671,241	107	\$6,273
			\$671,241	107	
7	BEEHIVE TEL CO - NV	WESTERN WIRELESS	\$982,686	729	\$1,348
			\$982,686	729	
8	ELSIE COMM., INC.	ALLTEL COMMUNICATIONS OF NEBRASKA, INC.	\$474,242	223	\$2,127
			\$474,242	223	

¹ Source: USAC data. Federal Communications Commission staff was unable to independently validate these data.

² Federal Communications Commission staff estimates of average annual competitive ETC lines.

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List of Carriers Not Receiving High-Cost Support in 2008

Study Area				Percentage of	Percentage of
Rank	Study Area Name	Competitor Not Receiving High-Cost Support ¹	Wireless	Population Covered	Area Covered
1	BEAVER CREEK TIMBRLN	ADVANCED TELCOM GROUP, INC. - WA	N		
		BROADWING COMMUNICATIONS, LLC - WA	N		
		COMCAST PHONE OF WASHINGTON/OREGON, LLC - WA	N		
		ELECTRIC LIGHTWAVE, LLC DBA INTEGRA TELECOM - WA	N		
		GLOBAL CROSSING LOCAL SERVICES, INC.-WA	N		
		INTEGRA TELECOM OF WASHINGTON, INC. - WA	N		
		INTERNATIONAL TELCOM, LTD. - WA	N		
		LEVEL 3 COMMUNICATIONS, LLC - WA	N		
		MCIMETRO, ATS, INC.	N		
		MCLEODUSA TELECOMMUNICATIONS SERVICES, INC.- WA	N		
		PAC - WEST TELECOMM, INC. - WA	N		
		SPRINT COMMUNICATIONS COMPANY, L.P. - WA	N		
		TELEPORT COMMUNICATIONS GROUP - SEATTLE	N		
		TW TELECOM OF WASHINGTON LLC - WA	N		
		XO WASHINGTON, INC.	N		
2	BORDER TO BORDER	AT&T Mobility	Y	100	95
		Leap Wireless	Y	18	14
		Pocket Communications	Y	91	80
		Sprint Nextel	Y	92	78
		T-Mobile USA	Y	90	79
		Verizon Wireless	Y	65	53
3	WESTGATE COMM. LLC dba WEAVTEL	CHARTER FIBERLINK WA - CCVII, LLC - WA	N		
		COMPUTERS 5*, INC. DBA LOCALTEL - WA	N		
		LEVEL 3 COMMUNICATIONS, LLC - WA	N		
		MCI WORLDCOM COMMUNICATIONS, INC. - WA	N		
		NORTHWEST TELEPHONE INCORPORATED	N		
		SPRINT COMMUNICATIONS COMPANY, L.P. - WA	N		

List of Carriers Not Receiving High-Cost Support in 2008

Study Area				Percentage of	Percentage of
Rank	Study Area Name	Competitor Not Receiving High-Cost Support ¹	Wireless	Population Covered	Area Covered
4	SANDWICH ISLES COMM.	AT&T Mobility	Y	100	100
		CLEARWIRE TELECOMMUNICATIONS SERVICES, LLC - HI	N		
		COMMPARTNERS, LLC - HI	N		
		HAWAIIAN TELCOM SERVICES COMPANY, INC.	N		
		MCIMETRO, ATS, INC.	N		
		PACIFIC LIGHTNET, INC. - HI	N		
		SPRINT COMMUNICATIONS COMPANY, L.P. - HI	N		
		T-Mobile USA	Y	100	95
		TW TELECOM OF HAWAII L.P. - HI	N		
		Verizon Wireless	Y	100	100
5	ADAK TEL UTILITY	GCI Communication Corp.	Y	100	65
6	ALLBAND COMM. COOP.	None found			

List of Carriers Not Receiving High-Cost Support in 2008

Study Area		Competitor Not Receiving High-Cost Support ¹	Wireless	Percentage of Population Covered	Percentage of Area Covered
Rank	Study Area Name				
7	ACCIPITER COMM.	ALLEGIANCE TELECOM OF ARIZONA, INC. - AZ	N		
		AT&T LOCAL	N		
		AT&T Mobility	Y	98	88
		CITYNET ARIZONA, LLC - AZ	N		
		COX ARIZONA TELCOM, INC. - AZ	N		
		ELECTRIC LIGHTWAVE, LLC DBA INTEGRA TELECOM - AZ	N		
		ESCHELON TELECOM OF ARIZONA, INC. - AZ	N		
		GILA LOCAL EXCHANGE CARRIER, INC. - AZ	N		
		GLOBAL CROSSING LOCAL SERVICES, INC.-AZ	N		
		GREAT WEST SERVICES, LTD. - ARIZONA	N		
		LEVEL 3 COMMUNICATIONS, LLC - AZ	N		
		Leap Wireless	Y	87	34
		MCIMETRO, ATS, INC.	N		
		MCLEODUSA TELECOMMUNICATIONS SERVICES, INC.- AZ	N		
		MOUNTAIN TELECOMMUNICATIONS, INC. - CLEC	N		
		NATIONAL BRANDS, INC. DBA SHARENET COMMS - AZ	N		
		NEUTRAL TANDEM-ARIZONA, LLC - AZ	N		
		NORTH COUNTY COMMUNICATIONS CORP.	N		
		PAC - WEST TELECOMM, INC. - AZ	N		
		SBC LONG DISTANCE, LLC DBA AT&T LONG DISTANCE - AZ	N		
		SPRINT COMMUNICATIONS COMPANY, L.P. - AZ	N		
		Sprint Nextel	Y	100	98
		T-Mobile USA	Y	100	100
		TELEPORT COMMUNICATIONS GROUP - PHOENIX	N		
		TIME WARNER TELECOM OF ARIZONA, LLC-AZ	N		
		Verizon Wireless	Y	100	100
		XO ARIZONA, INC.	N		
YMAX COMMUNICATIONS CORP. - AZ	N				
8	TERRAL TEL CO	AT&T Mobility	Y	100	100
		Choice Wireless	Y	2	18
		Pioneer Cellular	Y	100	100
		Sprint Nextel	Y	96	85
		T-Mobile USA	Y	99	79
		Verizon Wireless	Y	100	100

List of Carriers Not Receiving High-Cost Support in 2008

Study Area		Competitor Not Receiving High-Cost Support ¹	Wireless	Percentage of	Percentage of
Rank	Study Area Name			Population Covered	Area Covered
9	S. CENTRAL TEL - OK	AT&T Mobility	Y	100	100
		Pioneer Cellular	Y	100	100
		Verizon Wireless	Y	3	11
10	SOUTH PARK TEL. CO.	Commnet Wireless	Y	77	82

¹ For wireless carriers, the Telcordia® LERG™ [Local Exchange Routing Guide] Routing Guide (the "LERG") was used to determine the switch names (and from that, the wire center names) for each incumbent ETC. American Roamer® was then used to create a list of competing wireless carriers. United States Census data and wirecenter boundary information were used to determine the percentages of population and area covered by each wireless carrier. For wireline carriers, the LERG was used to determine the rate centers served by each incumbent ETC. Any other wireline carrier serving those rate centers was added to the list of wireline carriers competing against the incumbent ETC. Because the Commission does not possess current rate center boundaries, census data were not used to determine the percentages of population and area covered by the rate center. A list of carriers receiving High-Cost Support was also generated using Tables HC18 - HC21 of the Appendices from USAC's quarterly filings for each quarter in 2008. Carriers on the first two lists (the American Roamer-based list and the LERG-based list) that were not on the High-Cost Support list are identified here. Because carriers may serve only a portion of a rate center, the list of wireline carriers may be over inclusive. In particular, because very small incumbent LECs may serve only a small portion of a large rate center, the list of wireline carriers (which can be developed only at the rate center level) may be significantly over inclusive in some instances. Also, matching carrier names among the lists is an imperfect art because, for example, carriers often use multiple different names. Although care was used in the matching process, there may be some carriers on this list that receive High-Cost Support. Further, our sources may have omitted other carriers, especially resellers, that compete with the incumbent but do not receive High-Cost Support.