

DIRECT TESTIMONY
OF
JAMES ZOLNIEREK

POLICY DEPARTMENT
TELECOMMUNICATIONS DIVISION
ILLINOIS COMMERCE COMMISSION

IN THE MATTER OF THE PETITION OF ILLINOIS VALLEY CELLULAR RSA 2-I
PARTNERSHIP FOR DESIGNATION AS AN ELIGIBLE
TELECOMMUNICATIONS CARRIER UNDER 47 U.S.C. § 214(e)(2)

DOCKET NO. 04-0454

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1 **Q. Please state your name and business address.**

2 A. My name is James Zolnierек and my business address is 527 East Capitol
3 Avenue, Springfield, Illinois 62701.

4

5 **Q. By whom are you employed and in what capacity?**

6 A. I am employed by the Illinois Commerce Commission (“Commission” or
7 “ICC”) as the Interim Manager of Policy Department within the Public
8 Utility Bureau’s Telecommunications Division.

9

10 **Q. Please state your education background and previous job**
11 **responsibilities.**

12 A. I earned my Doctor of Philosophy degree in economics from Michigan
13 State University in 1996. Prior to joining the Illinois Commerce
14 Commission I was employed by the Federal Communications Commission
15 (“FCC”) in the Common Carrier Bureau, Industry Analysis Division.

16

17 **Overview**

18

19 **Q. What is the purpose of your testimony?**

20 A. In this proceeding Illinois Valley Cellular RSA 2-I Partnership (“IVC”) seeks
21 redefinition of the service area of “Citizens Telecommunications of Illinois
22 d/b/a Frontier Communications of Illinois (“Citizens”).¹ With respect to

¹ Illinois Valley Cellular RSA 2-I Partnership, Petition for Designation of Eligible Telecommunications Carrier, Docket No. 04-0454 (“Petition”) at 12.

23 such rural redefinition requests, the Federal Communications Commission
24 (“FCC”) has indicated that:

25 As part of the public interest analysis for ETC applicants that
26 seek designation below the service area level of a rural
27 incumbent LEC, we will perform an examination to detect the
28 potential for creamskimming effects that is similar to the
29 analysis employed in the *Virginia Cellular ETC Designation*
30 *Order* and the *Highland Cellular ETC Designation Order*.
31 As discussed below, the state commissions that apply a
32 creamskimming analysis similar to the Commission’s will
33 facilitate the Commission’s review of petitions seeking
34 redefinition of incumbent LEC service areas filed pursuant to
35 section 214(e)(5) of the Act.²
36

37 Following the FCC’s direction, here I provide an analysis of the potential
38 for creamskimming effects raised by IVC’s request for service area
39 redefinition in the Citizens rural service area.

40
41 Although, IVC also proposes redefinitions of certain non-rural local
42 exchange carrier service areas,³ I do not provide an analysis of the
43 potential for creamskimming effects raised by IVC’s request for service
44 area redefinitions in the non-rural service areas. With respect to such
45 non-rural redefinition requests the FCC has stated:

46 We find that a creamskimming analysis is unnecessary for
47 ETC applicants seeking designation below the service area
48 level of non-rural incumbent LECs. Unlike the rural
49 mechanism, which uses embedded costs to distribute
50 support on a service area-wide basis, the non-rural
51 mechanism uses a forward-looking cost model to distribute
52 support to individual wire centers where costs exceed the
53 national average by a certain amount. Therefore, under the

² Federal Communications Commission, Report and Order (“ETC Order”), CC Docket No. 96-45, FCC 05-46, Released March 17, 2005, at ¶ 48 (footnotes omitted).

³ See Petition, Appendix D.

54 non-rural methodology, high-density, low-cost wire centers
55 receive little or no high-cost support, thereby protecting
56 against the potential for creamskimming.⁴
57

58 Accordingly, I do not provide an analysis of the potential for
59 creamskimming effects raised by IVC's request for service area
60 redefinitions in non-rural service areas.

61

62 **FCC Creamskimming Analysis Guidelines**

63

64 **Q. What circumstances has the FCC identified as creating the potential**
65 **for creamskimming?**

66 A. The FCC has stated that “[t]he potential for creamskimming ... arises
67 when an ETC seeks designation in a disproportionate share of high-
68 density wire centers in an incumbent LEC's service area.”⁵

69

70 **Q. Why has the FCC identified creamskimming as a public interest**
71 **concern?**

72 A. The FCC has identified two primary concerns with respect to
73 creamskimming. First the FCC stated:

74 By serving a disproportionate share of the high-density
75 portion of a service area, an ETC may receive more support
76 than is reflective of the rural incumbent LEC's costs of
77 serving that wire center because support for each line is
78 based on the rural telephone company's average costs for
79 serving the entire service area unless the incumbent LEC
80 has disaggregated its support.⁶

⁴ FCC, ETC Order, at ¶ 52 (footnotes omitted).

⁵ Id. at ¶ 49.

⁶ Id.

81

82 Second, the FCC stated:

83 The effects of creamskimming also would unfairly affect the
84 incumbent LEC's ability to provide service throughout the
85 area since it would be obligated to serve the remaining high-
86 cost wire centers in the rural service area while ETCs could
87 target the rural incumbent LEC's customers in the lowest
88 cost areas and also receive support for serving the
89 customers in these areas.⁷
90

91 **Q. Do the FCC guidelines for analyzing creamskimming require an**
92 **assessment of whether a carrier seeking ETC designation intends to**
93 **creamskim or not?**

94 A. No. The FCC has stated that "...the analysis should consider not whether
95 the competitive ETC intends to creamskim, but whether the ETC
96 applicant's proposed service area has the effect of creamskimming."⁸
97

98 **Staff Information**
99

100 **Q. Did you compile any information with respect to wire-center density**
101 **in the rural service areas where IVC is seeking redesignation?**

102 A. Yes. For each of the five rural service areas, I computed the value of the
103 population per square mile for each wire center contained within the rural
104 service area. These figures are presented in Exhibit JZ-1 to my testimony.
105 I obtained wire center boundary information from Wire Center Premium v

⁷ Id.

⁸ Id. at ¶ 49, n. 136.

106 7.3.⁹ I obtained population and area information from the 2000 Census of
107 Population and Housing.¹⁰

108

109 **Q. How did you calculate population per square mile and household per**
110 **square mile information?**

111 A. I mapped each census block reported in the 2000 Census of Population
112 into the boundary of an individual Illinois wire center based upon the
113 internal point latitude and longitude for each census block contained in the
114 2000 Census of Population. Then, for each wire center, I summed the
115 population and land area figures from the 2000 Census of Population for
116 each census block that I mapped into each wire center.

117

118 **Creamskimming Analysis**

119

120 ***Citizens Service Area***

121

122 **Q. Does the information you collected provide any reason to believe**
123 **that the potential for creamskimming exists with respect to IVC's**
124 **proposal to serve only a portion of the Citizens service area?**

125 A. No. The information I compiled suggests that the average population
126 density of the portion of the Citizens service area IVC proposes to include

⁹ Wire Center Premium v 7.3 is dated October 2003 and is produced by Geographic Data Technology.

¹⁰ The 2000 Census of Population and Housing is produced by the U.S. Department of Commerce, U.S. Census Bureau.

127 as part of its designated ETC area is below the average population density
128 of the portion of the Citizens service area IVC does not propose to include
129 as part of its designated ETC area and below the average population
130 density of the entire Citizens service area.¹¹

131

132 **Conclusion**

133

134 **Q. What is your conclusion with respect to the rural service area**
135 **redefinition proposed by IVC?**

136 A. The information I have compiled and analyzed does not suggest that there
137 are any potential creamskimming issues related to IVC's proposal to
138 redefine the Citizens service area.

139

140 **Q. Does this conclude your testimony?**

141 A. Yes.

¹¹ The averages computed here across wire centers are weighted by wire center populations. Therefore, the averages reported here are equivalent to figures derived by dividing the entire population of the area containing the wire centers by the total land area containing the wire centers.

OCNAME	DOMSWITCH	WIRE CENTER	POP100	Land Area (Sqr. Miles)	Population per Square Mile	Covered
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	DUBSILXERS0	DUBOIS	779	53.51777962	14.56	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	ADVLXERS0	ADDIEVILLE	564	29.07721117	19.40	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	HYTNLXEDS0	HOYLETON	1,360	86.34077648	15.75	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	NWMDILXERS0	NEW MINDON	404	25.72907596	15.70	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	ASHYLXERS0	ASHLEY	1,715	63.01867808	27.21	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	TAMRILXERS0	TAMAROA	1,977	78.47490568	25.19	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	MLGVILXERS0	MULBERRY GROVE	2,004	72.58552742	27.61	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	WTVLILXERS0	WALTONVILLE	1,700	79.19538044	21.47	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	KYPTILXERS0	KEYESPORT	1,299	37.19211363	34.93	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	INA ILXERS0	INA	3,219	31.77631055	101.30	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	BTLXERS0	BARTELSO	1,186	26.55945124	44.65	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	WDLWILXEDS0	WOODLAWN	3,658	113.5294851	32.22	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	HFMNIXERS0	HOFFMAN	832	25.1599992	33.07	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	IVTNILXERS0	IRVINGTON	1,301	20.0110348	65.01	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	SNDVILXEDS0	SANDOVAL	1,875	18.748561	100.01	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	SETNIXDRS0	SEATON	503	47.25529385	10.64	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	STRILXCRS0	SUTTER	512	58.29855351	8.78	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	ELIZILXDRS0	ELIZA	1,010	96.185119	10.50	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	NBTNIXDRS0	NEW BOSTON	1,148	47.75384017	24.04	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	BATHILXDDO	BATH	1,019	86.41559691	11.79	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	HPPLILXERS1	HOOPPOLE	485	44.97080411	10.78	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	LTYRILXDRS0	LITTLE YORK	764	69.10251129	11.06	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	BASCILXCRS0	BASCO	1,224	118.3445796	10.34	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	CHWKILXARS0	CHADWICK	1,069	55.87033762	19.13	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	NHNDILXDRS0	NORTH HENDERSON	412	32.66887762	12.61	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	ELTNILXCRS0	ELVANSTON	362	37.88985702	9.55	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	CHFDILXERS0	CHESTERFIELD-ROCKBRIDGE	1,132	90.56287635	12.50	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	LYNDILXADS0	LYNDON	1,270	39.62972299	32.05	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	FRRSILXCRS0	FERRIS	655	57.56136206	11.38	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	KLBRILXDRS0	KILBOURNE	617	46.75700003	13.20	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	FLMRILXCRS0	FILLMORE	1,041	63.41217295	16.42	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	LNMLILXDRS0	LONDON MILLS	817	40.71399173	20.07	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	HBGCILXERS0	HAMBURG	661	41.57654514	15.90	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	STPRILXERS0	ST PETER	1,496	103.1716286	14.50	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	BCCYILXERS0	BEECHER CITY	1,361	54.2250968	25.10	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	PATKILXERS0	PATOKA	2,084	115.8060288	18.00	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	RIO ILXDRS0	RIO	463	25.25326295	18.33	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	KMVLILAARS0	KAMPSVILLE	585	29.57621541	19.78	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	BRSILXERS0	BRUSSELS	1,131	50.76576185	22.28	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	FARNILXERS0	FARINA	1,654	79.86290786	20.71	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	HTTCILXERS0	HETTICK	471	29.21057356	16.12	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	KRWDLXDRS0	KIRKWOOD	1,310	67.25450388	19.48	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	RMSYILXEDS0	RAMSEY	2,588	135.401249	19.11	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	BTTWILXERS0	BATCHTOWN	837	43.0490315	19.44	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	PSBGILXERS0	PITTSBURG	704	53.38549986	13.19	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	FLDNILXERS0	FIELDON	1,127	64.67399772	17.43	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	NWDGILXCRS0	NEW DOUGLAS	911	39.72281416	22.93	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	NAUVILXCRS0	NAUVOO	1,689	54.87218087	30.78	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	DLCYILXCRS0	DALLAS CITY	1,447	19.72944546	73.34	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	RSVLILXDRS1	ROSEVILLE	1,538	70.89828447	21.69	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	COLTILXARS0	COLETA	748	31.28753068	23.91	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	BGVLILXDRS1	BIGGSVILLE	1,110	50.34352321	22.05	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	JOY ILXDRS0	JOY	822	57.9736381	14.18	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	TMPCLXADS0	TAMPICO	2,163	111.2324656	19.45	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	BOWNILXCRS0	BOWEN	789	54.71449984	14.42	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	GNVWILXCRS0	GREENVIEW	1,622	77.28866041	20.99	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	MEDRILXERS0	MEDORA	1,882	74.38986165	25.30	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	HLDLILXDRS0	HILLSDALE	1,496	49.0505651	30.50	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	STRNLXDRS0	STRONGHURST	1,835	88.85124526	20.65	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	DNSNIXCRS0	DONNELSON	1,208	49.9754968	24.17	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	ALXSILXDRS0	ALEXIS	1,645	87.72546861	18.75	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	WRSWILXCRS0	WARSAW	2,084	64.3147447	32.40	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	SHNNILXARS0	SHANNON	1,588	64.51350045	24.62	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	EDWDILXERS0	EDGEWOOD	2,340	91.39909644	25.60	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	LNKRILXADS0	LANARK	3,110	101.2597166	30.71	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	ANDVILXDRS0	ANDOVER	1,565	50.96146971	30.71	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	HRDNILXERS0	HARDIN	1,687	57.09817343	29.55	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	BRTWILXERS0	BROWNSTOWN	1,494	42.58385444	35.08	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	CRDVILXDRS0	CORDOVA	1,151	31.06907136	37.05	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	SRNTILXCRS0	SORENTO	1,249	37.80748405	33.04	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	COFNILXCRS0	COFFEEN	1,393	44.26555837	31.47	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	ALBYILXDRS0	ALBANY	2,358	65.53378124	35.98	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	CRTHILXCDO	CARTHAGE	3,347	72.17437417	46.37	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	STEMILXERS0	ST ELMO	2,222	58.24699767	38.15	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	ERIEILXDRS0	ERIE	2,856	86.10480512	33.17	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	MSCYILXCDO	MASON CITY	3,170	90.26829545	35.12	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	PRMPILXDRS0	PREEMPTION	554	15.33025945	36.14	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	ALPHILXDRS0	ALPHA	1,123	28.51929507	39.38	No

ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	SHTCILXERS0	SHATTUC	786	46.68406842	16.84	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	ALEDILXDDS0	ALEDO	5,069	107.7438672	47.05	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	NIOTILXCRS0	NIOTA	373	16.75114132	22.27	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	ABNGILXDRS0	ABINGDON	4,866	96.50008263	50.42	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	HMTNILXCDS0	HAMILTON	3,789	60.84941784	62.27	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	SHWYILXCDS0	SHUMWAY	3,857	64.65383932	59.66	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	MDVLILXADS0	MILLEDGEVILLE	1,989	69.16435675	28.76	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	ALMTILXEDS0	ALTAMOUNT	3,937	76.29538824	51.60	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	PPTWILXADS0	PROPHETSTOWN	2,858	66.34829003	43.08	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	CRVLILXCDS0	CARLINVILLE	8,753	165.2501869	52.97	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	POLOILXADS0	POLO	3,884	93.59917305	41.50	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	MTVLILXDRS0	MATHERVILLE	1,244	19.20288974	64.78	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	WTSNILXCDS0	WATSON	3,965	70.70385268	56.08	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	MRSNILXADS0	MORRISON	7,651	137.0464381	55.83	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	DOW ILXERS0	DOW	1,966	25.08230193	78.38	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	GLPTILXDRS0	GULFPORT	746	30.88816512	24.15	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	MTOLILXCDS0	MOUNT OLIVE	3,640	48.94661172	74.37	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	SHRRILXDDS0	SHERRARD	2,105	29.73002114	70.80	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	KTBGILXDRS0	KEITHSBURG	980	38.20716081	25.65	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	MNMOILXDDS0	MONMOUTH	11,771	114.9839822	102.37	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	JRVLILXEDS0	JERSEYVILLE	10,820	120.7413169	89.61	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	BNHLILXERS0	BUNKER HILL	3,164	31.28357429	101.14	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	GLLSILXCRS0	GILLESPIE	4,607	45.19901559	101.93	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	PTBYILXDDS0	PORT BYRON	3,962	36.71352416	107.92	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	EDBQILXSDS0	E. DUBUQUE	4,882	36.66065557	133.17	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	OQWKILXDRS0	OQUAWKA	2,335	23.74827876	98.32	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	TTPLILXDDS0	TEUTOPOLIS	3,335	29.67605912	112.38	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	FLTNILXADS0	FULTON	4,654	19.48371112	238.87	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	BNLDILXCRS0	BENLD	3,110	15.47539525	200.96	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	HMPNILXDDS0	EAST MOLINE (HAMPTON)	3,152	14.52149469	217.06	No
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	UNCOVERED EXCHANGES		226,831	6,359	35.67	
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	THMSILXARS0	THOMAS (WHITESIDE CO)	432	43.95871294	9.83	Yes
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	COVERED EXCHANGES		432	44	9.83	
ITIZENS TELECOM CO ILLINOIS-FRONTIER CITIZENS -I	TOTAL		227,263	6403.12	35.49	