

**STATE OF ILLINOIS**

**ILLINOIS COMMERCE COMMISSION**

GENESEO TELEPHONE COMPANY,	)	
CAMBRIDGE TELEPHONE COMPANY and	)	
HENRY COUNTY TELEPHONE COMPANY	)	
	)	Docket No. 11-0210
Petition for Universal Service.	)	
	)	
ILLINOIS INDEPENDENT TELEPHONE	)	Docket No. 11-0211
ASSOCIATION	)	Consolidated
	)	
Petition to update the Section 13-301(1)(d) Illinois	)	
Universal Service Fund and to implement Intrastate	)	
Switched Access Charge reform as described herein	)	
and for other relief.	)	

**REBUTTAL TESTIMONY OF TOM A. KORTE**  
**ON BEHALF OF WABASH TELEPHONE COOPERATIVE**

**March 23, 2012**

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

2 A. My name is Tom A. Korte. My business address is 3220 Pleasant Run, Springfield,  
3 Illinois 62711.

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

5 A. I am employed as Senior Consultant by GVNW Consulting, Inc. I am testifying in this  
6 proceeding on behalf of Wabash Telephone Cooperative (the “Company”).

7 **Q. Did you file direct testimony in this proceeding on May 9, 2011?**

8 A. Yes.

9 **Q. What is the purpose of your rebuttal testimony?**

10 A. The purpose of my rebuttal testimony is to: 1) submit a revised Schedule 1.01 as  
11 discussed in the further rebuttal testimony of Mr. Schoonmaker filed on March 23, 2012;  
12 2) reply to Staff witness Jim Zolnierek regarding adjustments to the Company’s revenues  
13 for what he describes as “unreported revenues”; 3) reply to the direct testimony of Staff  
14 witness Jeff Hoagg regarding the RUS loan issue; and 4) reply to Scott Rubins of the  
15 Geneseo Companies regarding his calculation of reported corporate operations expenses  
16 in excess of the federal HCL cap.

17 **Q. Why is the Company submitting a revised Schedule 1.01?**

18 A. As Mr. Schoonmaker has discussed in his rebuttal testimony, the Company has made a  
19 revenue adjustment for the results of intrastate originating access based on 2009  
20 originating billing units and the intrastate rates at the end of the year compared to the  
21 billing that would have occurred if interstate rates had been applied to those same 2009

22 originating billing units. The Company has entered the resulting revenue reduction  
23 adjustment into the revised Schedule 1.01 that it is filing.

24 The Company has also revised the Schedule 1.01 is to change the state tax rate from 7.3%  
25 to 9.5% in response to an adjustment proposed by Staff Witness Mary Everson. Finally,  
26 the Company has revised the Schedule 1.01 to update the High Cost Loop revenues  
27 adjustment to reflect the 2011 amount which is now known and measurable.

28 **Q. Staff witness Jim Zolnierек on pages 26 through 28 of his direct testimony and on**  
29 **ICC Staff Exhibits 3.03 and 3.04 discusses and calculates adjustments to the**  
30 **Company’s Schedule 1.01 revenues for what he describes as “unreported revenues”.**  
31 **Does the Company agree that these adjustments are appropriate?**

32 A. No. It is inappropriate to conclude that the differences shown on Staff Exhibits 3.03 and  
33 3.04 constitute “unreported revenues”. In fact, they are a result of a complicated NECA  
34 settlements process. Mr. Schoonmaker has discussed this issue and described the NECA  
35 settlement process in detail in his rebuttal testimony.

36 The Company is a cost settlement company and is in the NECA traffic sensitive (TS)  
37 pool. The Company booked revenues in appropriate Part 32 accounts based on amounts  
38 received from NECA as shown on the monthly NECA 3050 statement. The amounts that  
39 the Company has reported for ICLS on data request GCH 1.06 are current period (2009)  
40 amounts and prior period amounts received from NECA. Current period and prior period  
41 ICLS amounts are booked in separate Part 32 accounts and so are easy to identify. The  
42 amounts that the Company has reported for LSS on data request GCH 1.06 are current

43 period and prior period amounts as these are booked in the same Part 32 account. The  
44 amount that the Company reported for Safety Net is the current period amount which is  
45 booked in a separate Part 32 account. The non-USF amount that the Company reported  
46 on JZ 2.04 includes all other federal access revenues booked in appropriate Part 32  
47 accounts and included on the Schedule 1.01. There are no “unreported revenues”.

48 The Company has revised its responses to data requests GCH 1.06 and JZ 2.04 (which  
49 are attached to this testimony as Wabash Exhibits 3.01 and 3.02, respectively) in order to  
50 clearly and properly tie to Federal Access Revenues as shown on Line 8, Page 3 of the  
51 Company’s Schedule 1.01, attached as Wabash Exhibit 1.01 (corrected as of 3/23/12).

52 The Company agrees with Mr. Schoonmaker’s statement that the Commission should  
53 reject the imposition of Staff witness Zolnierек’s adjustments for “unreported revenues”.

54 The Company has reported and included on Schedule 1.01 all the revenues that have been  
55 appropriately booked in 2009.

56 **Q. In his direct testimony on pages 25-27, Staff witness Hoagg discusses his**  
57 **understanding that the Company has or will receive approximately \$21 million in**  
58 **“federal loan support” for broadband services provision under a RUS program of**  
59 **the US Department of Agriculture. Has the Company received such a loan?**

60 A. The Company has received a \$21.8 million loan commitment from the Rural Utility  
61 Service (“RUS”) in conjunction with a fiber to the home (“FTTH”) project the Company  
62 is currently implementing.

63 **Q. The Commission Staff also suggests that the Company should be excluded from an**  
64 **updated IUSF until it provides a more detailed explanation of the loan. Do you**  
65 **agree?**

66 A. No. The \$21.8 million is a loan. Although the RUS program has sometimes been  
67 referred to as “federal loan support,” securing a loan for \$21.8 million does not comprise  
68 federal “support” in any meaningful sense. Rather, it is an actual and *bona fide* loan,  
69 with a 21-year repayment schedule and a maturity date of November 2032. Wabash must  
70 repay the loan to RUS in full, plus interest. During the term of the loan, Wabash is  
71 subject to RUS-imposed financial, collateral, and audit covenants. It is no different from  
72 any other government or private bank loan for which Wabash and other entities must  
73 apply, obtain approval, comply with the contractual requirements, and repay in order to  
74 obtain the funds necessary for substantial investment projects.

75 Second, as I will explain in greater detail below, the Company correctly accounted for  
76 this loan and the associated fiber-to-the-home (FTTH) project on Schedule 1.01. RUS  
77 identifies the primary purpose of these funds as being “to finance the improvement,  
78 expansion, construction of systems or facilities to furnish and improve telephone service  
79 in rural areas.” The loan is no different from Wabash’s previous RUS loans. The  
80 Company has been a long-time borrower from RUS, and has a lending relationship with  
81 RUS going back to at least the 1950s. The Company has relied upon RUS loans to  
82 finance several significant telecommunications infrastructure construction projects. The  
83 Company’s 12/31/09 RUS Form 479 financial data included outstanding RUS long-term  
84 debt in the amount of \$1,059,380 associated with previous projects. In short, Wabash has

85 been a long-time borrower from RUS. Reasonably and properly, the Commission has  
86 never previously questioned the eligibility for IUSF support of the projects and facilities  
87 associated with these prior RUS loans.

88 Third, since this loan was approved in 2011, nothing about this loan impacts the  
89 Company's 2009 financials which is the period for the data used on the Schedule 1.01 in  
90 this proceeding. It is also clear from looking at the Company's Schedule 1.01 that no rate  
91 base adjustments, no expense adjustments, and no revenue adjustments have been made  
92 associated with a FTTH project. Therefore, the Company's Schedule 1.01 does not  
93 include any amounts associated with the FTTH project associated with the loan.

94 **Q. Mr. Hoagg and Ms. Everson raised questions about the accounting for the RUS**  
95 **loan. Can you provide an explanation of the accounting process?**

96 A. First of all, as I explained above, the RUS loan is not "federal support," but rather is an  
97 RUS loan for a specific infrastructure project within a portion of Wabash's network. As  
98 with previously-obtained RUS and commercial loans that Wabash has received, this  
99 particular RUS loan must be repaid in full, with interest, and comes with a set of  
100 financial, collateral, and other loan covenants with which Wabash must comply to avoid  
101 default and acceleration of its repayment obligations.

102 Second, the RUS loan funds referenced by the Staff will be received as currently planned  
103 by Wabash during the 2012-to-2017 period, and (given the general two-year lag between  
104 expenditures and high-cost support) these loan funds and associated investments and  
105 expenses are not likely to begin to be reflected in federal or IUSF support calculations

106 until the 2014-to-2019 period. In other words, the FTTH project relates to a period which  
107 is clearly and entirely outside the scope of this proceeding. For numerous reasons of case  
108 management, administrative efficiencies, and consistency, the parties to this proceeding  
109 have elected to utilize 2009 financial results as reported to the Commission with the  
110 standard adjustments agreed to and described in Mr. Schoonmaker's testimony. Wabash  
111 understands that the Staff wants simply to understand the nature of this loan. So I will  
112 discuss below the accounting treatment and general impacts of the loan funds and the  
113 potential impact on future funding periods.

114 **Q. How are the RUS loans treated for accounting and rate base purposes?**

115 A. Wabash, like all other Illinois local exchange carriers, is subject to FCC accounting  
116 requirements which are found in Section 32 of the FCC's Rules. (*See* 47 C.F.R. Part 32 –  
117 Uniform System of Accounts for Telecommunications Companies.) Moreover, the  
118 Illinois Commerce Commission further requires its local exchange carriers to follow the  
119 FCC's Part 32. *See* Commission Rule 710.01:

120 The Illinois Commerce Commission (Commission) adopts 47 CFR 32, as of  
121 March 2, 2005, as its uniform system of accounts for telecommunications  
122 carriers, as defined in Section 13-202 of the Public Utilities Act [220 ILCS  
123 5/13-202], subject to the exceptions set forth in this Part. No incorporation in  
124 this Part includes any later amendment or edition.

125 Under Part 32, regulated assets purchased with RUS loan proceeds are treated just like  
126 any other regulated asset; the fact that the regulated asset was purchased with loan  
127 proceeds does not exclude the asset from ratemaking. RUS loans are not contributions of  
128 capital, and therefore should be treated consistently with normal capitalization practices.  
129 Regulated assets purchased with loan funds are included in both ratemaking and universal

130 service support calculations. When Wabash draws down portions of the loan from RUS,  
131 it will debit a cash account and credit a long-term loans payable account just like it has  
132 done for previous RUS and commercial loans consistent with the Part 32 accounting  
133 rules. When Wabash uses loan proceeds to pay for facilities and equipment, Wabash will  
134 debit the appropriate fixed asset account(s) and credit a cash account in the same manner  
135 that it has treated previous loan-financed investments. It will subsequently account for  
136 depreciation, accumulated depreciation, interest expense, and principal repayments in the  
137 same way it has done for prior loans and infrastructure investments.

138 As a result, facilities and equipment purchased with the \$21.8 million RUS loan will  
139 eventually be included in Wabash's rate base when this plant is in service, and will affect  
140 its future federal high-cost and IUSF support. This prescribed FCC accounting treatment  
141 yields a result that is reasonable and equitable for Wabash, its customers, and the entities  
142 that contribute directly and indirectly to the IUSF and federal universal service programs.

143 **Q. Should the Commission consider the specific financial impact of the RUS loan**  
144 **funding on the proposed IUSF and the Schedule 1.01?**

145 A. First and foremost, the RUS loan identified will have no impact on Wabash's  
146 Schedule 1.01 funding request here because it will not be reflected in any Wabash  
147 financials until 2012, and even if the IUSF were updated annually (which Wabash  
148 advocates) they would not impact IUSF payments until the 2014 time frame. Here, the  
149 IITA has agreed with AT&T to use 2009 as a base year for reasons explained by Mr.  
150 Schoonmaker in his various testimonies. Even if the RUS loan had some extraordinary

151 impact on Wabash (which it will not) it would be inappropriate to single out Wabash for  
152 changes to its financials outside of the established base year.

153 **Q. Please provide a brief summary of Staff witness Mary Everson’s direct testimony in**  
154 **this proceeding and the potential impact on Wabash.**

155 A. Ms. Everson’s testimony incorporates the adjustments proposed by Dr. Zolnierek to the  
156 Schedules 1.01 submitted by the majority of the IITA member companies; however,  
157 Ms. Everson’s testimony did not incorporate Wabash Telephone Cooperative.  
158 Ms. Everson’s testimony should be updated to include Wabash Telephone Cooperative  
159 and the supporting Schedule 1.01 (see attachment) should be adopted in light of the  
160 clarification and reconciliation of Wabash’s RUS funding.

161 **Q. GCHC witness Scott Rubins in his rebuttal testimony on page 24 and in GCHC**  
162 **Exhibit 2.18 discusses and calculates corporate operations expenses that the**  
163 **Company has reported in the Schedule 1.01 in excess of the federal HCL cap. Does**  
164 **the Company agree with this calculation?**

165 A. No. Mr. Schoonmaker on behalf of the IITA in his further rebuttal testimony filed on  
166 March 23, 2012 discusses this issue and the calculations on GCHC Exhibit 2.18. The  
167 Company agrees with Mr. Schoonmaker. The Company was not subject to the corporate  
168 operations cap in its 2010 HCL submission which was based on 2009 data. The amount  
169 shown on GCHC Exhibit 2.18 in the second column is the total 2009 general ledger  
170 amount of corporate operations expenses which is also shown on the Company’s 2009  
171 Form 23A filed with the ICC. The amount shown on GCHC Exhibit 2.18 in the third  
172 column is the amount of the Company’s corporate operations expense after “cost study

173 adjustments". This adjusted amount is the amount included on the Company's Schedule  
174 1.01.

175 **Q. Have you provided the Company's corrected Schedule 1.01 with all the requisite**  
176 **information to Mr. Schoonmaker for his use in adjusting the composite results for**  
177 **all companies seeking updated IUSF funding in connection with his testimony in this**  
178 **docket?**

179 A. Yes, I provided this corrected Schedule 1.01 (Wabash Exhibit 1.01 (as revised 3/23/12) to  
180 Mr. Schoonmaker of the IITA so that he could use it to adjust his calculation of updated  
181 IUSF funding.

182 **Q. Is the Company's Schedule 1.01 (Wabash Exhibit 1.01 (as revised 3/23/12) to this**  
183 **testimony) true and correct to the best of your knowledge, information and belief?**

184 A. Yes.

185 **Q. Does that conclude your rebuttal testimony?**

186 A. Yes it does.

ILLINOIS COMMERCE COMMISSION

Docket Nos. 11-0210 and 11-0211 (Cons.)

(Response to Geneseo, Cambridge and Henry County Data Request GCH 1.06)

Utility Company: Wabash Telephone Cooperative  
Person Responsible: Tom Korte  
Job Title: Senior Consultant, GVNW Consulting, Inc.  
Business Address: 3220 Pleasant Run Springfield, Illinois 62711  
Telephone Number: (217) 862-1944  
Response due: Revised March 23, 2012

Data Request No. GCH 1.06

Exhibit 1, Schedule 1.01, page 3, Line 9 – Federal High Cost Loop Support only includes high cost loop support. Please provide amounts for 2009 and 2010 Local Switching Support, Interstate Common Line Support, Interstate Access Support, Safety Net and Safety Value Support, and for the 2009 amounts identify for each amount what line number this amount is included in Exhibit 1, Schedule 1.01, page 3.

Response:

	<u>2009</u>	<u>2010</u>
Local Switching Support	\$238,510	\$212,364
Interstate Common Line Support	\$676,668	\$852,604
Interstate Access Support	0	0
Safety Net	\$160,380	\$72,480
Safety Valve	0	0

The amounts above include all current period and prior period amounts booked in the current year based on the NECA 3050 settlement statements.

The 2009 amounts for Local Switching Support, Interstate Common Line Support and Safety Net are included in Exhibit 1, Schedule 1.01, page 3 on Line 8, Federal Access Revenues which is \$1,162,952. The amounts above for 2009 total \$1,075,558. The difference in the two total amounts is \$87,394. This amount is shown on the response to data request JZ 2.04.

ILLINOIS COMMERCE COMMISSION

Docket Nos. 11-0210 and 11-0211 (Cons.)

(Response to Staff's Data Request JZ 2.04)

Utility Company: Wabash Telephone Cooperative

Person Responsible: Tom Korte  
Job Title: Senior Consultant GVNW Consulting, Inc.  
Business Address: 3220 Pleasant Run Springfield, IL 62711  
Telephone Number: (217) 862-1944

Response due: Revised March 23, 2012

JZ 2.04 Please provide the amount of revenue included within "Federal Access Revenues" on Page 3, Line #8 of Wabash Telephone Cooperative Telephone Company Exhibit 1.01 excluding Federal Universal Service Fund revenue.

Response: The amount excluding the amounts reported for LSS, ICLS and Safety Net on the revised response to GCH 1.06 is \$87,394.

See the revised response to GCH 1.06.

**Wabash Telephone Cooperative**  
**Illinois Universal Service Funding Calculation**  
Based upon RUS Form 479 Data for December 31, 2009

<u>Line #</u>	<u>Description</u>	<u>Source</u>	<u>Amount</u>	<u>Adjustment*</u>	<u>Adjusted Amount</u>
1	Net Regulated Plant	Form 23A, P 8, Net Plant	\$ 12,126,212	\$ (228,160)	\$ 11,898,052
2	Materials and Supplies Inventory	Page 2, 13-Month Average	384,764		384,764
3	Customer Deposits	Form 23A, P 8, 4040	13,990	-	13,990
4	ADIT - Regulated Plant	Form 23A, P 8, 4100 + 4340	-	-	-
5	Rate Base before Working Capital	line 1 + line 2 - line 3 - line 4			12,268,826
6	Working Capital Requirement				
7	Total Operating Expenses	Form 23A, P 11, Total	5,711,378	(23,695)	5,687,683
8	Less: Depreciation Expense	Form 23A, P 11, 6560	1,901,427	(14,797)	1,886,630
9	Total WC Operating Expense	line 7 - line 8	3,809,951	(8,898)	3,801,053
10	WC OE Requirement	line 9 * 45 / 360			475,132
11	Commission-Ordered Cash Balance Requirement		-	-	-
12	Total Working Capital Requirement	line 10 + line 11			475,132
13	Total Rate Base	line 5 + line 12			12,743,958
14	Total Operating Revenues	Form 23A, P 9, Total	6,419,825	(620,540)	5,799,285
15	Less: Illinois Universal Service Fund	Page 3, Line 4	711,204	-	711,204
16	Net Operating Revenues	line 14 - line 15	5,708,621	(620,540)	5,088,081
17	Total Operating Expenses	Form 23A, P 11, Total	5,711,378	(23,695)	5,687,683
18	Other Operating Inc and Exp - Net	Form 23A, P 12, 7100	-	-	-
19	Other Operating Taxes	Form 23A, P 12, 7240	38,698	-	38,698
20	Net Op Inc before Income Taxes	line 16 - lines 17, 18, & 19	(41,455)	(596,845)	(638,300)
21	Income Tax Expense	line 34			-
22	Net Operating Income	line 20 - line 21			(638,300)
23	Return on Rate Base	line 22 / line 13			-5.01%
24	After-tax Cost of Capital				9.34%
25	Target Net Operating Income	line 24 * line 13			1,190,286
26	Adj to Achieve Target Return on RB	line 25 - line 22			1,828,586
27	Gross Revenue Conversion Factor	line 35			1.0000
28	ROR Funding Deficiency Including Inc Taxes	line 26 * line 27			1,828,586
29	Calculation of Income Tax Expense				
30	Net Op Inc before Inc Taxes	line 20			(638,300)
31	Illinois Inc & Rep Tax Expense	line 30 * 9.50%			-
32	Net Op Inc before Fed Inc Tax	line 30 - line 31			(638,300)
33	Federal Income Tax Expense	line 32 * 34.00%			-
34	Total Imputed Income Tax Expense	line 31 + line 33			-
35	Gross Revenue Conversion Factor	1/((1 - 0)*(1 - 0))			1.0000

\* Provide detail on Page 4 for all adjustments.

Wabash Telephone Cooperative  
Illinois Universal Service Funding Calculation  
Based upon RUS Form 479 Data for December 31, 2009  
Material & Supplies Worksheet and Other Information

<u>Line #</u>		
1	December-08	\$105,977
2	January-09	\$100,622
3	February-09	\$96,429
4	March-09	\$92,449
5	April-09	\$92,037
6	May-09	\$85,478
7	June-09	\$83,605
8	July-09	\$448,266
9	August-09	\$805,932
10	September-09	\$793,127
11	October-09	\$757,356
12	November-09	\$725,359
13	December-09	\$815,292
14	13 Month Average	\$384,764

Sale/Lease Back Arrangement

- The company does not have any sale(s)/lease back arrangement.  
 The company does have sale(s)/lease back arrangement.

Lease Agreement with Affiliates

- The company does not have any lease agreements with affiliates.  
 The company does have lease agreements with affiliates.

Tax Status (1=Taxable, 2=Coop) 2

After Tax Return-Taxable 9.34%  
After Tax Return-Coop 9.34%

Wabash Telephone Cooperative  
 Illinois Universal Service Funding Calculation  
 Based upon RUS Form 479 Data for December 31, 2009  
 Operating Revenues By Category

<u>Line #</u>		<u>Source</u>	<u>Amount</u>
1	Local Revenues	Form 23A, P 9, Total Local Network Service Revenues	\$ 531,285
2	State Subscriber Line Charges	Trial Balance 12/31/09	\$ 514,238
3	State Access Revenues	Trial Balance 12/31/09	\$ 941,018
4	State Universal Service Support	Trial Balance 12/31/09	\$ 711,204
5	State Special Access Revenues	Trial Balance 12/31/09	\$ 128,857
6	Total State Access & Local Revenues	Sum (Ln 1 - 5)	<u>\$ 2,826,602</u>
7	Federal Subscriber Lines Charges	Trial Balance 12/31/09	\$ 369,181
8	Federal Access Revenues	Trial Balance 12/31/09	\$ 1,162,952
9	Federal High Cost Loop Support	Trial Balance 12/31/09	\$ 1,274,556
10	Federal Special Access Revenues	Trial Balance 12/31/09	\$ 544,974
11	Total Federal Access Revenues	Sum (Ln 7 - 10)	<u>\$ 3,351,663</u>
12	Misc Revenues	Trial Balance 12/31/09	\$ 241,560
13	Total Operating Revenues	Ln 6 + Ln 11 + Ln 12	<u><u>\$ 6,419,825</u></u>

Wabash Telephone Cooperative  
 Illinois Universal Service Funding Calculation  
 Based upon RUS Form 479 Data for December 31, 2009  
 Description of Adjustments

Description of Adjustment	Debit	Credit
<u>Rate Base Adjustments</u>		
Telephone Plant Acquisition Adjustment		\$27,377
Non-regulated adjustment - plant		\$491,871
Non-regulated adjustment - accum. Depr.	\$267,217	
TPAA Amortization	\$23,871	
<b>Total Adjustment</b>		<b>\$228,160</b>
 <u>Revenue Adjustments</u>		
High Cost Loop - Booked 2009		\$1,274,556
High Cost Loop - Actual 2011		\$738,228
Adjustment	\$536,328	
Prior Year CL Settlement		\$125,029
Prior Year TS Settlement		\$59,549
Affordable rate		\$14,400
Intrastate access at interstate rates	\$283,190	
<b>Total Revenue Adjustment</b>	<b>\$620,540</b>	
 <u>Expense Adjustments</u>		
<b>Total Non-regulated expenses</b>		<b>\$23,695</b>
<b>Depreciation expense non-regulated</b>		<b>\$14,797</b>

Note: Carry all adjustments forward to Page 1

**CERTIFICATE OF SERVICE**  
Docket No. 11-0211 (Consolidated)

The undersigned certifies that a copy of the *Rebuttal Testimony of Tom A. Korte on Behalf of Wabash Telephone Cooperative* was served upon all parties to the above cause at their address as follows:

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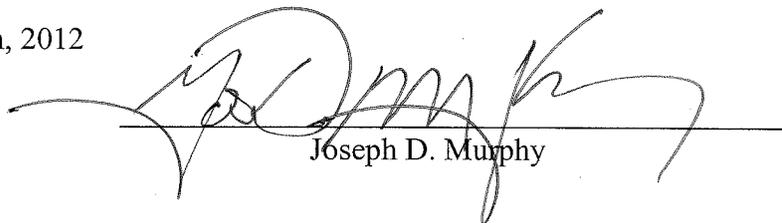
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