

SECRETARY'S RECORD, NEBRASKA PUBLIC SERVICE COMMISSION

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BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

In the Matter of the Nebraska ) Application No. NUSF-108  
Public Service Commission, on )  
its own Motion, to make )  
adjustments to its high-cost ) ORDER SEEKING FURTHER  
distribution mechanism and ) COMMENT AND RELEASING  
make revisions to its ) PROPOSED 2017 DISTRIBUTION  
reporting requirements. ) CALCULATIONS  
)  
) Entered: December 20, 2016

BY THE COMMISSION:

The Nebraska Public Service Commission (Commission) opened this proceeding to consider certain modifications to the high-cost funding mechanism in the universal service fund program. Notice of this proceeding appeared in the Daily Record, Omaha, Nebraska on October 4, 2016.

On September 27, 2016, the Commission proposed several modifications to the distribution mechanism for price cap carriers. The Commission proposed, among other things, to put the distribution of support for price cap carriers back through Support Allocation Mechanism (SAM). The Commission further proposed to make certain adjustments to the NUSF-EARN Form process that would take into consideration revenues lost from competitive losses, a 9.75 percent rate of return input, and a reduction to offset federal CAF II program support received.

With the adjustments made to the NUSF-EARN Form reporting process as described above, rather than disallowing or capping NUSF support calculated through the SAM process, the Commission proposed to allocate that portion of support to grant-based projects. The Commission stated its goal of spurring broadband investment and increasing the accountability of carriers receiving support in a manner that can be measured by the Commission.

The Commission received comments and reply responsive to its proposals on October 27, 2016 and November 14, 2016 respectively. Initial comments were filed by Qwest Corporation d/b/a CenturyLink QC and United Telephone Company of the West d/b/a CenturyLink (CenturyLink); Citizens Telecommunications Company of Nebraska, Inc. d/b/a Frontier Communications of Nebraska (Frontier); the Rural Independent Companies (RIC); the Rural Telecommunications Coalition of

Nebraska (RTCN); and Windstream Nebraska Inc. (Windstream). Reply comments were filed by CenturyLink; Frontier; RIC; and Windstream.

A hearing was held on November 29, 2016 in legislative format. Mr. William Kreutz provided testimony for Windstream. Mr. Scott Bohler provided testimony for Frontier.

#### O P I N I O N   A N D   F I N D I N G S

The Commission proposed to put the distribution of high-cost support for price cap carriers back through the SAM. The Commission proposed to continue to maintain separate budgets for rate-of-return and price cap carriers and to continue to maintain the relative allocation of each budget minus the overall reduction in support due to forecasted remittances. Although some carriers sought clarification about the manner in which this proposal would be implemented, no one opposed this proposal. The Commission finds subject to the comments relative to the model changes as a whole, that this proposal should be adopted. Attachment "A" which is attached to this Order and fully incorporated herein, shows the separate budgets for price cap and rate of return carriers in 2017. That Appendix further shows the projected overall reduction in remittances for 2016/2017 at 16 percent. We note that based on our projections, NUSF remittances will continue to decline significantly if contribution reform is not adopted.<sup>1</sup>

In addition, the Commission proposed several changes that would result in a shift of distributed high-cost support to grant based support for price cap carriers. CenturyLink, Frontier and Windstream filed comments expressing concerns about the proposed change to consider competitive losses in the NUSF EARN Form calculation. The Commission proposed this change to address a shortcoming of the NUSF EARN process that has become apparent over the years. The NUSF EARN Form initially was developed to measure the earnings level of companies relative to a specific rate of return utilizing carrier investment, expense and revenue data. It was designed to be a tool in which to provide an incentive for carriers to

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<sup>1</sup>The Commission estimates that between 2017 and 2018 there will be a 20 percent reduction in remittance receipts.

invest in their networks. If a carrier's investment levels declined their earnings level would change making them eligible for less NUSF high cost support. However, the Commission believes that the competitive losses experienced by carriers and subsequent decrease in revenues may have masked the decreases in their network investments and skewed the measure of support needed by these carriers. This has had the unintended consequence of keeping them eligible for support, not because of investments made, but because of the loss of revenue in the urban areas.

Our data has indicated a significant decline in investment levels by price cap carriers over the years. Our data further shows an increase in investment made by rate of return carriers. The Commission wants to ensure that all carriers are making needed investments in rural high cost areas with their NUSF support and making timely upgrades to their outdated plant facilities. Likewise, the Commission has been focused on increasing transparency and accountability metrics in its high-cost program. We further recognize the need to set clear goals for broadband deployment, particularly in those areas that do not receive federal CAF II program support.

Accordingly, the Commission is releasing the staff's calculations which show how the adoption of the September 27th proposal related to competitive losses would have affected the distribution of support. Calculations related to competitive losses and access line counts are attached hereto as Attachment "D". Calculations showing the effect to ongoing support vs. grant based support for price cap carriers had the Commission adopted implementation of a competitive loss factor are shown in the second table in Attachment "C". Likewise, had the carriers investment levels not declined, our data shows, even with the implementation of the competitive losses they would have continued to remain eligible for ongoing support. This is illustrated in the third table of Attachment "C".

However, in response to the written comments and testimony provided at the hearing, the Commission believes that a better policy alternative would be to simply determine that price cap carrier high-cost support should simply be converted to 100 percent capital investment support. We believe this policy approach will lead to more efficient and targeted use of high-cost support and provide the increased

accountability the Commission was seeking. The proposed calculations are shown in Attachment "B".

Finally, the staff has included other proposed changes in Appendix "A" that would impact the distribution of support for all high-cost fund recipients, not just price cap carriers. Those proposed changes include a step down in the rate of return to 11 percent which would mirror the rate of return cap established by the FCC. The proposal would include a change in the benchmark to \$52.50 which also matches the benchmark adopted by the FCC. We further clarify that NUSF-7 support has been removed from the SAM and will now be paid outside the model.

The Commission proposes the 2017 high-cost support be distributed consistent with the calculations provided in Attachment "B" to this Order. More detailed information can be found in the 2017 SAM Model on the Commission's website at <http://www.psc.nebraska.gov>.

As mentioned in the public hearing, we will seek comment on the proposed distribution of support as it affects all carriers. Comments responsive to this Order may be filed on or before **January 20, 2017**. Commenters should file one (1) paper copy and one (1) electronic copy of their Comments with the Commission. Electronic copies should be sent to [Sue.Vanicek@nebraska.gov](mailto:Sue.Vanicek@nebraska.gov) and [Brandy.Zierott@nebraska.gov](mailto:Brandy.Zierott@nebraska.gov).

#### O R D E R

IT IS THEREFORE ORDERED by the Nebraska Public Service Commission that comments responsive to the Attachments to this Order as well as the proposed 2017 Distribution Model located on our website may be filed on or before **January 20, 2017** in the manner prescribed herein.

IT IS FURTHER ORDERED that 2017 high-cost support payments shall be calculated consistent with Attachment "B" but shall be subject to true-up upon a final Order.

SECRETARY'S RECORD, NEBRASKA PUBLIC SERVICE COMMISSION

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Application No. NUSF-108

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ENTERED AND MADE EFFECTIVE at Lincoln, Nebraska this  
20<sup>th</sup> day of December, 2016.




NEBRASKA PUBLIC SERVICE COMMISSION

COMMISSIONERS CONCURRING:

  
Chairman

ATTEST:

  
Deputy Director

  
  
  
//s//Frank E. Landis

//s//Tim Schram

NUSF-108  
December 20, 2016

Attachment A

# INPUTS

Separate Price Cap & Rate of Return Budgets? Yes

	Total	Combined	Price Cap	Rate of Return
2016 Fixed Wireless Broadband Budgets	\$ 36,664,068		\$ 18,936,695	\$ 17,727,372
2016 to 2017 Projected Reduction due to Remittances	-16.26%			
2017 Fixed Wireless Broadband Budget without Addback	\$ 30,702,490			
2017 Addition from NUSF Balance	\$ 4,500,000			
2016 to 2017 Projected Reduction with Addback	96.01%		96.01%	96.01%
2017 Fixed Wireless Broadband Budgets	\$ 35,202,490		\$ 18,181,802	\$ 17,020,688

Benchmark \$ 52.50

## Eligible for On-Going

Price Cap No  
Rate of Return Yes

## Earnings Above Limit to Grants

Price Cap Yes  
Rate of Return No

## Cost and Density Regression Data

	Value
Density Breakpoint Between Low and Medium Density Support Areas	4.5
Density Breakpoint Between Medium and High Density Support Areas	34.0
Low Density Areas Constant Term	6.4048
Medium Density Areas Constant Term	4.3937
High Density Areas Constant Term	3.0198
Low Density Areas Density Coefficient	(0.51197000)
Medium Density Areas Density Coefficient	(0.04066600)
High Density Areas Density Coefficient	(0.00026585)

Company Name	Company Type	2017 SAM Allocation	Total Eligible Amount	Initial On-Going	Initial Grant-Based	Final On-Going	Final Grant-Based	Final Total Distribution
Arapahoe	RoR	\$ 478,813	\$ 1,345,972	\$ 478,813	\$ -	\$ 562,904	\$ -	\$ 562,904
Benkelman	RoR	\$ 251,671	\$ 587,361	\$ 251,671	\$ -	\$ 295,871	\$ -	\$ 295,871
Cambridge	RoR	\$ 185,119	\$ 766,567	\$ 185,119	\$ -	\$ 217,630	\$ -	\$ 217,630
CenturyLink	PC	\$ 2,166,814	\$ 701,587	\$ 701,587	\$ 1,465,227	\$ -	\$ 2,166,814	\$ 2,166,814
Citizens	PC	\$ 2,749,929	\$ 1,357,461	\$ 1,357,461	\$ 1,392,467	\$ -	\$ 2,749,929	\$ 2,749,929
Clarks	RoR	\$ 146,482	\$ 367,942	\$ 146,482	\$ -	\$ 172,208	\$ -	\$ 172,208
Cons Telco	RoR	\$ 485,981	\$ 198,499	\$ 198,499	\$ -	\$ 198,499	\$ -	\$ 198,499
Cons Tele	RoR	\$ 1,243,760	\$ 245,147	\$ 245,147	\$ -	\$ 245,147	\$ -	\$ 245,147
Cons Telecom	RoR	\$ 386,589	\$ 110,086	\$ 110,086	\$ -	\$ 110,086	\$ -	\$ 110,086
Cozad	RoR	\$ 104,867	\$ 1,315,250	\$ 104,867	\$ -	\$ 123,284	\$ -	\$ 123,284
Curtis	RoR	\$ 174,811	\$ 110,808	\$ 110,808	\$ -	\$ 110,808	\$ -	\$ 110,808
Dalton	RoR	\$ 450,212	\$ 4,373	\$ 4,373	\$ -	\$ 4,373	\$ -	\$ 4,373
Diller	RoR	\$ 189,845	\$ 571,137	\$ 189,845	\$ -	\$ 223,186	\$ -	\$ 223,186
Elsie	RoR	\$ 81,394	\$ 44,521	\$ 44,521	\$ -	\$ 44,521	\$ -	\$ 44,521
Glenwood	RoR	\$ 562,753	\$ 1,440,558	\$ 562,753	\$ -	\$ 661,585	\$ -	\$ 661,585
Great Plains	RoR	\$ 6,036,153	\$ 17,462,299	\$ 6,036,153	\$ -	\$ 7,096,245	\$ -	\$ 7,096,245
Hamilton	RoR	\$ 311,394	\$ 734,492	\$ 311,394	\$ -	\$ 366,082	\$ -	\$ 366,082
Hartington	RoR	\$ 81,434	\$ 571,849	\$ 81,434	\$ -	\$ 95,736	\$ -	\$ 95,736
Hartman	RoR	\$ 166,977	\$ 401,129	\$ 166,977	\$ -	\$ 196,303	\$ -	\$ 196,303
Hemingford	RoR	\$ 260,941	\$ 1,232,130	\$ 260,941	\$ -	\$ 306,769	\$ -	\$ 306,769
Hershey	RoR	\$ 68,682	\$ 247,930	\$ 68,682	\$ -	\$ 80,744	\$ -	\$ 80,744
Hooper	RoR	\$ 85,349	\$ 20,550	\$ 20,550	\$ -	\$ 20,550	\$ -	\$ 20,550
Huntel	RoR	\$ 628,120	\$ 607,975	\$ 607,975	\$ -	\$ 607,975	\$ -	\$ 607,975
K&M	RoR	\$ 259,538	\$ 295,539	\$ 259,538	\$ -	\$ 295,539	\$ -	\$ 295,539
Keystone	RoR	\$ 245,876	\$ 169,701	\$ 169,701	\$ -	\$ 169,701	\$ -	\$ 169,701
Mainstay	RoR	\$ 50,667	\$ 669,414	\$ 50,667	\$ -	\$ 59,565	\$ -	\$ 59,565
Neb Central	RoR	\$ 1,600,884	\$ 1,925,689	\$ 1,600,884	\$ -	\$ 1,882,037	\$ -	\$ 1,882,037
Northeast	RoR	\$ 1,170,757	\$ 4,088,236	\$ 1,170,757	\$ -	\$ 1,376,370	\$ -	\$ 1,376,370
Pierce	RoR	\$ 161,162	\$ 880,580	\$ 161,162	\$ -	\$ 189,465	\$ -	\$ 189,465
Plainview	RoR	\$ 125,821	\$ 508,288	\$ 125,821	\$ -	\$ 147,918	\$ -	\$ 147,918
Qwest	PC	\$ 7,772,094	\$ -	\$ -	\$ 7,772,094	\$ -	\$ 7,772,094	\$ 7,772,094
Sodtown	RoR	\$ 38,279	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Southeast	RoR	\$ 257,822	\$ 1,121,505	\$ 257,822	\$ -	\$ 303,102	\$ -	\$ 303,102
Stanton	RoR	\$ 107,991	\$ 451,953	\$ 107,991	\$ -	\$ 126,957	\$ -	\$ 126,957
Three River	RoR	\$ 456,094	\$ 1,766,303	\$ 456,094	\$ -	\$ 536,194	\$ -	\$ 536,194
Wauneta	RoR	\$ 164,451	\$ 434,064	\$ 164,451	\$ -	\$ 193,333	\$ -	\$ 193,333
Windstream	PC	\$ 5,492,965	\$ -	\$ -	\$ 5,492,965	\$ -	\$ 5,492,965	\$ 5,492,965
Total		\$ 35,202,490	\$ 42,756,896	\$ 16,771,027	\$ 16,122,754	\$ 17,020,688	\$ 18,181,802	\$ 35,202,490
Price Cap		\$ 18,181,802	\$ 2,059,049	\$ 2,059,049	\$ 16,122,754	\$ -	\$ 18,181,802	\$ 18,181,802
Rate of Return		\$ 17,020,688	\$ 40,697,847	\$ 14,711,978	\$ -	\$ 17,020,688	\$ -	\$ 17,020,688

Company Name	Company Type	12% Rate of Return			12% Rate of Return & Competitive Loss			12% Rate of Return & Competitive Loss & Initial Investment Levels			Price Cap Company Change in On-Going Support	
		Final On-Going	Final Grant-Based	Final Total Distribution	Final On-Going	Final Grant-Based	Final Total Distribution	Final On-Going	Final Grant-Based	Final Total Distribution		
Arapahoe	RoR	\$ 550,142	\$ -	\$ 550,142	\$ 550,224	\$ -	\$ 550,224	\$ 486,792	\$ -	\$ 486,792		
Benkelman	RoR	\$ 289,163	\$ -	\$ 289,163	\$ 289,206	\$ -	\$ 289,206	\$ 255,865	\$ -	\$ 255,865		
Cambridge	RoR	\$ 212,696	\$ -	\$ 212,696	\$ 212,727	\$ -	\$ 212,727	\$ 188,203	\$ -	\$ 188,203		
CenturyLink	PC	\$ 2,035,969	\$ 130,845	\$ 2,166,814	\$ 750,148	\$ 1,416,666	\$ 2,166,814	\$ 2,166,814	\$ -	\$ 2,166,814	\$ 130,845	6%
Citizens	PC	\$ 2,749,929	\$ -	\$ 2,749,929	\$ 1,495,324	\$ 1,254,605	\$ 2,749,929	\$ 2,749,929	\$ -	\$ 2,749,929	\$ -	0%
Clarks	RoR	\$ 168,304	\$ -	\$ 168,304	\$ 168,328	\$ -	\$ 168,328	\$ 148,923	\$ -	\$ 148,923		
Cons Telco	RoR	\$ 231,176	\$ -	\$ 231,176	\$ 230,574	\$ -	\$ 230,574	\$ 350,532	\$ -	\$ 350,532		
Cons Tele	RoR	\$ 325,038	\$ -	\$ 325,038	\$ 325,038	\$ -	\$ 325,038	\$ 1,264,485	\$ -	\$ 1,264,485		
Cons Telecom	RoR	\$ 138,067	\$ -	\$ 138,067	\$ 137,873	\$ -	\$ 137,873	\$ 393,031	\$ -	\$ 393,031		
Cozad	RoR	\$ 120,489	\$ -	\$ 120,489	\$ 120,507	\$ -	\$ 120,507	\$ 106,614	\$ -	\$ 106,614		
Curtis	RoR	\$ 131,273	\$ -	\$ 131,273	\$ 131,273	\$ -	\$ 131,273	\$ 177,724	\$ -	\$ 177,724		
Dalton	RoR	\$ 32,388	\$ -	\$ 32,388	\$ 30,839	\$ -	\$ 30,839	\$ 427,855	\$ -	\$ 427,855		
Diller	RoR	\$ 218,126	\$ -	\$ 218,126	\$ 218,158	\$ -	\$ 218,158	\$ 193,008	\$ -	\$ 193,008		
Elsie	RoR	\$ 53,800	\$ -	\$ 53,800	\$ 53,800	\$ -	\$ 53,800	\$ 82,750	\$ -	\$ 82,750		
Glenwood	RoR	\$ 646,586	\$ -	\$ 646,586	\$ 646,682	\$ -	\$ 646,682	\$ 572,130	\$ -	\$ 572,130		
Great Plains	RoR	\$ 6,935,364	\$ -	\$ 6,935,364	\$ 6,936,387	\$ -	\$ 6,936,387	\$ 6,136,736	\$ -	\$ 6,136,736		
Hamilton	RoR	\$ 357,783	\$ -	\$ 357,783	\$ 357,836	\$ -	\$ 357,836	\$ 316,583	\$ -	\$ 316,583		
Hartington	RoR	\$ 93,565	\$ -	\$ 93,565	\$ 93,579	\$ -	\$ 93,579	\$ 82,791	\$ -	\$ 82,791		
Hartman	RoR	\$ 191,852	\$ -	\$ 191,852	\$ 191,880	\$ -	\$ 191,880	\$ 169,760	\$ -	\$ 169,760		
Hemingford	RoR	\$ 299,814	\$ -	\$ 299,814	\$ 299,858	\$ -	\$ 299,858	\$ 265,289	\$ -	\$ 265,289		
Hershey	RoR	\$ 78,914	\$ -	\$ 78,914	\$ 78,926	\$ -	\$ 78,926	\$ 69,827	\$ -	\$ 69,827		
Hooper	RoR	\$ 33,735	\$ -	\$ 33,735	\$ 33,735	\$ -	\$ 33,735	\$ 78,705	\$ -	\$ 78,705		
Huntel	RoR	\$ 721,691	\$ -	\$ 721,691	\$ 721,798	\$ -	\$ 721,798	\$ 638,586	\$ -	\$ 638,586		
K&M	RoR	\$ 298,201	\$ -	\$ 298,201	\$ 298,245	\$ -	\$ 298,245	\$ 263,862	\$ -	\$ 263,862		
Keystone	RoR	\$ 186,739	\$ -	\$ 186,739	\$ 186,739	\$ -	\$ 186,739	\$ 186,739	\$ -	\$ 186,739		
Mainstay	RoR	\$ 58,215	\$ -	\$ 58,215	\$ 58,223	\$ -	\$ 58,223	\$ 51,511	\$ -	\$ 51,511		
Neb Central	RoR	\$ 1,839,369	\$ -	\$ 1,839,369	\$ 1,839,641	\$ -	\$ 1,839,641	\$ 1,627,560	\$ -	\$ 1,627,560		
Northeast	RoR	\$ 1,345,166	\$ -	\$ 1,345,166	\$ 1,345,364	\$ -	\$ 1,345,364	\$ 1,190,266	\$ -	\$ 1,190,266		
Pierce	RoR	\$ 185,170	\$ -	\$ 185,170	\$ 185,197	\$ -	\$ 185,197	\$ 163,847	\$ -	\$ 163,847		
Plainview	RoR	\$ 144,565	\$ -	\$ 144,565	\$ 144,586	\$ -	\$ 144,586	\$ 127,917	\$ -	\$ 127,917		
Qwest	PC	\$ 7,772,094	\$ -	\$ 7,772,094	\$ -	\$ 7,772,094	\$ 7,772,094	\$ 7,772,094	\$ -	\$ 7,772,094	\$ -	0%
Sodtown	RoR	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -		
Southeast	RoR	\$ 296,230	\$ -	\$ 296,230	\$ 296,274	\$ -	\$ 296,274	\$ 262,118	\$ -	\$ 262,118		
Stanton	RoR	\$ 124,078	\$ -	\$ 124,078	\$ 124,097	\$ -	\$ 124,097	\$ 109,790	\$ -	\$ 109,790		
Three River	RoR	\$ 524,038	\$ -	\$ 524,038	\$ 524,116	\$ -	\$ 524,116	\$ 463,694	\$ -	\$ 463,694		
Wauneta	RoR	\$ 188,950	\$ -	\$ 188,950	\$ 188,978	\$ -	\$ 188,978	\$ 167,192	\$ -	\$ 167,192		
Windstream	PC	\$ 4,524,930	\$ 968,035	\$ 5,492,965	\$ -	\$ 5,492,965	\$ 5,492,965	\$ 2,953,622	\$ 2,539,343	\$ 5,492,965	\$ (1,571,309)	-35%
Total		\$ 34,103,610	\$ 1,098,880	\$ 35,202,490	\$ 19,266,160	\$ 15,936,330	\$ 35,202,490	\$ 32,663,147	\$ 2,539,343	\$ 35,202,490		
Price Cap		\$ 17,082,923	\$ 1,098,880	\$ 18,181,802	\$ 2,245,472	\$ 15,936,330	\$ 18,181,802	\$ 15,642,459	\$ 2,539,343	\$ 18,181,802	\$ (1,440,463)	-8%
Rate of Return		\$ 17,020,688	\$ -	\$ 17,020,688	\$ 17,020,688	\$ -	\$ 17,020,688	\$ 17,020,688	\$ -	\$ 17,020,688		

NUSF ETC Company	PSAP Line Counts			2016 Annual Report - Page 138					Variance	Competitive Loss		1998 Annual Report - Page 6	
	NUSF ETC	CLEC	Totals	Res Rate	Bus Rate	Month Res	Month Bus	Annual Total		Res Rate	Wgt Avg Rate	1998 Lines	Change
Arapahoe	21,095	149	21,245	\$ 17.50	\$ 27.50	1,261	524	21,420	-1.5%	\$ 2,614	\$ 3,052	2,469	(699)
Benkelman	10,603	-	10,603	\$ 19.95	\$ 27.50	582	270	10,224	3.7%	\$ -	\$ -	1,243	(359)
Cambridge	12,144	-	12,144	\$ 17.50	\$ 27.50	668	289	11,484	5.7%	\$ -	\$ -	1,281	(269)
Centurylink	98,115	56,281	154,396	\$ 19.25	\$ 30.00	5,215	2,622	94,044	4.3%	\$ 1,083,403	\$ 1,285,821	28,197	(15,331)
Citizens	246,709	129,818	376,527	\$ 21.50	\$ 32.50	10,863	12,089	275,424	-10.4%	\$ 2,791,087	\$ 3,543,224	56,788	(25,411)
Clarks	7,329	27	7,356	\$ 17.50	\$ 27.50	513	122	7,620	-3.8%	\$ 473	\$ 524	967	(354)
Cons Telco	12,447	27	12,474	\$ 19.95	\$ 27.50	734	329	12,756	-2.4%	\$ 539	\$ 602	1,583	(543)
Cons Tele	25,454	-	25,454	\$ 19.95	\$ 27.50	1,808	533	28,092	-9.4%	\$ -	\$ -	3,035	(914)
Cons Telecom	9,460	9	9,469	\$ 19.95	\$ 27.50	625	170	9,540	-0.8%	\$ 180	\$ 194	834	(45)
Cozad	18,718	70	18,788	\$ 19.95	\$ 29.95	925	619	18,528	1.0%	\$ 1,397	\$ 1,677	2,978	(1,412)
Curtis	5,954	-	5,954	\$ 19.95	\$ 27.50	334	164	5,976	-0.4%	\$ -	\$ -	825	(329)
Dalton	8,492	72	8,564	\$ 19.25	\$ 29.95	520	140	7,920	7.2%	\$ 1,386	\$ 1,549	1,299	(585)
Diller	8,189	-	8,189	\$ 19.95	\$ 27.50	617	110	8,724	-6.1%	\$ -	\$ -	907	(225)
Elsie	1,666	-	1,666	\$ 19.25	\$ 29.95	100	34	1,608	3.6%	\$ -	\$ -	209	(70)
Glenwood	25,255	24	25,279	\$ 17.50	\$ 27.50	1,707	344	24,612	2.6%	\$ 420	\$ 460	2,751	(644)
Great Plains	247,284	647	247,931	\$ 19.20	\$ 29.95	13,774	5,621	232,740	6.2%	\$ 12,420	\$ 14,436	33,092	(12,431)
Hamilton	57,605	164	57,769	\$ 17.95	\$ 17.95	3,198	1,496	56,328	2.3%	\$ 2,944	\$ 2,944	6,272	(1,458)
Hartington	15,194	1,432	16,626	\$ 17.50	\$ 27.50	872	402	15,288	-0.6%	\$ 25,060	\$ 29,579	1,594	(208)
Hartman	3,705	-	3,705	\$ 19.95	\$ 27.50	236	55	3,492	6.1%	\$ -	\$ -	441	(132)
Hemingford	8,317	18	8,335	\$ 19.90	\$ 27.50	532	156	8,256	0.7%	\$ 358	\$ 389	929	(234)
Hershey	7,110	-	7,110	\$ 17.50	\$ 27.50	505	95	7,200	-1.3%	\$ -	\$ -	852	(260)
Hooper	8,362	-	8,362	\$ 17.50	\$ 27.50	494	179	8,076	3.5%	\$ -	\$ -	1,264	(567)
Huntel	105,122	236	105,358	\$ 19.95	\$ 30.00	6,286	2,587	106,476	-1.3%	\$ 4,708	\$ 5,400	12,374	(3,594)
K&M	5,201	-	5,201	\$ 17.50	\$ 17.50	339	86	5,100	2.0%	\$ -	\$ -	650	(217)
Keystone	4,851	-	4,851	\$ 17.50	\$ 27.50	305	68	4,476	8.4%	\$ -	\$ -	618	(214)
Mainstay	9,957	-	9,957	\$ 17.50	\$ 27.50	602	209	9,732	2.3%	\$ -	\$ -	989	(159)
Neb Central	63,125	117	63,242	\$ 17.50	\$ 27.50	3,840	1,253	61,116	3.3%	\$ 2,048	\$ 2,335	8,783	(3,513)
Northeast	64,569	296	64,865	\$ 17.50	\$ 27.50	5,064	1,028	73,104	-11.7%	\$ 5,180	\$ 5,679	7,125	(1,720)
Pierce	15,235	341	15,576	\$ 17.50	\$ 20.45	914	322	14,832	2.7%	\$ 5,968	\$ 6,230	1,921	(623)
Plainview	10,408	-	10,408	\$ 19.95	\$ 27.50	627	220	10,164	2.4%	\$ -	\$ -	1,164	(297)
Qwest	1,248,423	2,616,867	3,865,289	\$ 20.46	\$ 31.00	51,117	62,169	1,359,432	-8.2%	\$ 53,541,098	\$ 68,677,403	525,212	(203,105)
Sodtoun	953	-	953	\$ 17.50	\$ 17.50	59	5	768	24.1%	\$ -	\$ -	87	(8)
Southeast	31,386	5,040	36,426	\$ 17.50	\$ 27.50	1,854	675	30,348	3.4%	\$ 88,191	\$ 101,642	4,137	(1,102)
Stanton	11,545	113	11,658	\$ 17.50	\$ 27.50	746	185	11,172	3.3%	\$ 1,973	\$ 2,198	1,157	(186)
Three River	12,726	18	12,744	\$ 20.00	\$ 27.50	876	189	12,780	-0.4%	\$ 360	\$ 384	1,251	(189)
Wauneta	5,788	-	5,788	\$ 19.95	\$ 27.50	356	122	5,736	0.9%	\$ -	\$ -	661	(179)
Windstream	1,429,913	467,062	1,896,975	\$ 17.50	\$ 31.99	77,707	62,060	1,677,204	-14.7%	\$ 8,173,587	\$ 11,178,627	273,008	(114,927)
Annual Totals	3,878,410	3,278,827	7,157,237			2,361,300	1,890,492	4,251,792	-8.8%	65,745,393	84,864,351	988,947	(392,511)
Monthly Totals	323,201	273,236	596,436			196,775	157,541	354,316	-8.8%			Check	(392,511)

-39.7%