



Before the Public Service Commission  
State of Missouri

In the Matter of the Application	)	
Of Mark Twain Communications	)	
Company for a nunc pro tunc	)	
Order Specifying the Service Area	)	
Of Mark Twain Communications,	)	
And redefining the Service Area of	)	
Spectra Communications for	)	Case No. TO-20006-0100
Purposes of Mark Twain's	)	
ETC Service Area and Federal	)	
Universal Service Support Pursuant	)	
To Section 254 of the Telecommuni-	)	
cations Act of 1996.	)	

**Affidavit of William Rohde**

William Rohde, of lawful age, being duly sworn and upon his oath states and deposes that the following is true based on my personal knowledge, information, and belief:

1. My name is William Rohde. I am General Manager and Executive Vice President of Mark Twain Communications Company (Mark Twain), and have held this position since Mark Twain's certification as a competitive local exchange company in 1997.

2. In its March 22, 2000 Application for ETC Designation, docket TA-2000-591, Mark Twain in paragraph 1 specified that its service area consisted of three Northeast Missouri exchanges, Ewing, La Belle, and Lewistown.

3. There were no interventions or requests for hearing in opposition to granting Mark Twain's ETC application in TA-2000-591.

4. In its Staff Recommendation of May, 16, 2000 in TA-2000-591, paragraph 3, Staff recommended the Commission “grant Mark Twain designation as an eligible telecommunications carrier for the purposes of receiving federal universal service support in its service area consisting of the Ewin[g], LaBelle, and Lewisto(w)n exchanges.”

5. The Commission’s June 15, 2000 Order granting Mark Twain’s Application for ETC designation indicated the Application and Staff Recommendation had been reviewed, and based on that review the Commission granted “the relief requested in Mark Twain’s application.”

6. The June 15, 2000 Order issued by the Commission did not explicitly describe the service area for which it designated Mark Twain as an ETC.

7. After receipt of the Commission’s June 15, 2000 Order in TA-2000-591 designating Mark Twain as an eligible telecommunications carrier, Mark Twain made application with the federal Universal Service Fund for USF support.

8. Mark Twain’s Application for USF support was approved. Mark Twain received federal high cost loop support for the three exchanges of Ewing, Labelle, and Lewistown from July of 2002 until July 2003. Mark Twain’s application for USF support, and the support it received, was for the provision of service in the Missouri exchanges of Ewing, La Belle, and Lewistown.

9. After July of 2003 the Universal Service Administrative Company (USAC) discontinued Mark Twain’s USF support. USAC provided Mark Twain with no notice of discontinuation, and no explanation of the basis for discontinuation.

10. After approximately two years of continued and repeated inquiry from Mark Twain to USAC, on or about August 4, 2005 Mark Twain received an August 1,

2005 letter from USAC pertaining to its discontinuation of USF. A copy of this letter is attached to this affidavit.

11. USAC's letter states that "By the time the solution to reinstate Mark Twain's HCL support was discovered, USAC considered Mark Twain subject to the service area redefinition provisions of Section 54.207 of the FCC's rules for the Ewing and Lewistown exchanges as they were rural wire centers". USAC's letter also pointed out that the Missouri Public Service Commission's June, 2000 Order designating Mark Twain as an ETC failed to specify the Ewing, LaBelle, and Lewistown exchanges or wire centers as those for which Mark Twain had been designated ETC.

12. Between the time of Mark Twain's ETC designation in June of 2000 and the August 2005 USAC letter the FCC requirements for ETC designations have been changed to impose new and additional requirements.

13. Due to the circumstances of this sequence of events, Mark Twain has decided to provide a record establishing that Mark Twain has met the following ETC requirements pertinent to Mark Twain, not just those specified in USAC's August 2005 letter.

14. Since June 15, 2000 Mark Twain has provided, and will continue to provide, the following services supported by the federal universal service support mechanisms:

- a. Voice grade access to public switched network, the ability to make and receive phone calls within a bandwidth of approximately 2700 Hertz, within the 300 to 3000 Hertz frequency range.
- b. Local usage (amount of minutes of use of exchange service provided free of charge to end users).
- c. Dual tone multi-frequency signaling or functional equivalent.

- d. Single party service.
- e. Access to emergency services (911 and E911) to PSAP with ANI and ALI.
- f. Access to operator services.
- g. Access to interexchange service.
- h. Access to directory assistance.
- i. Toll limitation for qualifying low-income individuals, either toll blocking or toll control.

15. Since June 15, 2000 Mark Twain has advertised the availability of these services supported by the universal services fund, and the charges therefore, using media of general distribution, and will continue to do so.

16. Since June 15, 2000 Mark Twain has advertised the availability of Lifeline and Link Up services in a manner reasonably designed to reach those likely to qualify for those services, and will continue to do so.

17. Since June 15, 2000 Mark Twain has committed to, and in fact has, provided service throughout Ewing, LaBelle and Lewistown. Mark Twain is committed to providing timely service to requesting customers in the future.

18. Since June 15, 2000 Mark Twain has had the ability to remain functional in emergency situations, and commits to continue to be able to do so.

19. Since June 15, 2000 Mark Twain has satisfied consumer protection and service quality standards, and commits to continue to do so.

20. Since June 15, 2000 Mark Twain has provided local usage plans in Ewing, LaBelle, and Lewistown that are comparable to, and competitive with, those of the incumbent Spectra Communications, and commits to continue to do so.

21. Since June 15, 2000 Mark Twain has provided equal access to interexchange carriers. In the event Spectra Communications relinquishes its ETC designation, Mark Twain commits to providing equal access thereafter.

22. Mark Twain commits to comply with all lawful FCC and Missouri Public Service Commission rules pertaining to competitive ETCs.

23. When Mark Twain decided to provide service in Ewing, LaBelle, and Lewistown, it selected those exchanges because they were in close proximity to customers served by Mark Twain's parent company, Mark Twain Rural Telephone Company.

24. Mark Twain did not decide to provide service in these three exchanges because they were low cost, high USF revenue exchanges from within Spectra's study area.

25. The following is a list of the 107 exchanges in Spectra's Study Area, the 2002 access line count for the exchanges as set forth in Spectra's disaggregation plan, the 2000 census population of the principal city, town, or village associated with the exchange taken from the Missouri Official Manual, the principal county in which the exchange is located, the 2002 census population for the county taken from the Missouri Official Manual, and the Spectra disaggregation zone applicable to the exchange:

<u>Exchange</u>	<u>City Pop.</u>	<u>Access Lines</u>	<u>County</u>	<u>County Pop.</u>	<u>Zone</u>
Macon	5,538	5,063	Macon	15,762	1
Aurora	7,014	5,673	Lawrence	35,204	1
Savannah	4,762	3,788	Andrew	16,492	1
Cameron	8,312	5,552	Clinton	18,979	1
Mt Vernon	4,017	4,452	Lawrence	35,204	1
Concordia	2,360	2,257	Lafayette	32,960	1
Mtn Grove	4,574	4,452	Wright	17,955	1

Canton	2,557	3,218	Lewis	10,494	1
Palmyra	3,467	3,218	Marion	28,289	1
Monroe Cty	2,588	2,634	Marion	28,289	1
Potosi	2,662	7,252	Washington	23,344	1
Brunswick	925	947	Chariton	8,438	1
Kahoka	2,241	2,125	Clark	7,416	1
Houston	1,992	3,574	Texas	23,003	2
LaGrange	1,000	971	Lewis	10,494	2
Plattsburg	2,354	2,219	Clinton	18,979	2
Lawson	2,336	2,573	Clay	184,006	2
Greenfield	1,358	1,774	Dade	7,923	2
Shelbina	1,943	1,693	Shelby	6,799	2
Hamilton	1,813	1,624	Caldwell	8,969	2
Ironton	1,471	3,990	Iron	10,697	2
Sarcoxi	1,354	1,908	Jasper	104,686	2
Eldorad Spgs	3,775	4,786	Cedar	13,733	2
Gower	1,399	1,276	Buchanan	85,988	2
<b>*Lewistown</b>	<b>595</b>	<b>267</b>	<b>Lewis</b>	<b>10,494</b>	<b>2</b>
Avenue Cty	na	448	Andrew	16,492	2
Nebo	na	452	Laclede	32,513	2
Laddonia	620	529	Audrain	25,853	2
Irondale	437	646	Washington	23,344	2
Licking	1,471	2,737	Texas	23,003	2
Braymer	910	813	Caldwell	8,969	2
Trimble	451	390	Clinton	18,979	2
Humansville	946	1,386	Polk	26,992	2
Birch Tree	634	1,185	Shannon	8,324	2
Paris	1,529	1,842	Monroe	9,311	2
Stewartvl	759	624	DeKalb	11,597	2
VanBuren	845	1,718	Carter	5,941	2
Winona	1,290	1,123	Shannon	8,324	2
Lesterville	na	418	Reynolds	6,689	2
LaPlata	1,486	1,490	Macon	15,762	2
Weableau	518	530	Hickory	8,940	2
Wayland	425	924	Clark	7,416	2
Bolckow	234	226	Andrew	16,492	2
Raymondvl	442	520	Texas	23,003	2
Easton	258	313	Buchanan	85,988	2
Clarence	915	988	Shelby	6,799	2
Perry	666	1,050	Ralls	9,626	2
Osceola	835	1,920	St. Clair	9,652	2
Rosendale	180	346	Andrew	16,492	2
Helena	na	293	Andrew	16,492	2
Maysville	1,212	1,703	DeKalb	11,597	2
Golden Cty	884	980	Barton	12,541	2
Clarksdale	351	364	DeKalb	11,597	2

Osborne	455	423	DeKalb	11,597	2
Annapolis	310	927	Iron	10,697	2
W. Quincy	na	275	Lewis	10,494	2
Belgrade	na	516	Washington	23,344	2
Amazonia	277	413	Andrew	16,492	2
Keytesvl	533	628	Chariton	8,438	2
Elsinore	363	1,135	Carter	5,941	2
Bellevue	na	439	Iron	10,697	2
Shelbyvil	682	612	Shelby	6,799	2
Caledonia	158	612	Washington	23,344	2
Hartville	607	1,602	Wright	17,955	2
Eminence	548	1,210	Shannon	8,324	2
Sheldon	529	764	Vernon	20,454	2
Jericho Spgs	259	535	Cedar	13,733	2
Norwood	552	1,088	Wright	17,955	2
Lowry Cty	728	1,043	St. Clair	9,652	2
<b>*LaBelle</b>	<b>669</b>	<b>271</b>	<b>Lewis</b>	<b>10,494</b>	<b>2</b>
Cosby	143	150	Andrew	16,492	2
<b>*Ewing</b>	<b>464</b>	<b>293</b>	<b>Lewis</b>	<b>10,494</b>	<b>2</b>
Fillmore	211	265	Andrew	16,492	2
Turney	155	175	Clinton	18,979	2
Everton	322	614	Dade	7,923	2
Kidder	271	438	Caldwell	8,969	2
Roby	na	1,185	Texas	23,003	2
Milo	84	579	Vernon	20,454	2
Gorin	na	172	Scotland	4,983	2
Collins	176	607	St. Clair	9,652	2
Edgar Spgs	190	1,056	Phelps	39,825	2
Kingston	287	535	Caldwell	8,969	2
Walker	275	369	Vernon	20,454	2
Schell Cty	286	584	Vernon	20,454	2
Revere	121	214	Clark	7,416	2
Grovesprg	na	667	Wright	17,955	2
Elmer	98	194	Macon	15,762	2
Avilla	137	678	Jasper	104,686	2
Dadeville	224	474	Dade	7,923	2
Bronaugh	245	459	Vernon	20,454	2
Bunker	427	746	Reynolds	6,689	2
Boss	na	370	Dent	14,927	2
Manes	na	667	Wright	17,955	2
Whitesville	na	194	Andrew	16,492	2
Centerville	171	301	Reynolds	6,689	2
Rockville	162	451	Bates	16,653	2
Dalton	27	57	Chariton	8,438	2
Hunnewell	227	252	Shelby	6,799	2
Arcola	45	264	Dade	7,923	2



Vanzant	na	553	Douglas	13,084	2
Oates	na	441	Reynolds	6,689	2
Monticello	126	273	Lewis	10,494	2
Fremont	na	192	Carter	5,941	2
Montauk	na	279	Dent	14,927	2
Santa Fe	na	182	Monroe	9,311	2
Timber	na	192	na		2
Stoutsvl	44	161	Monroe	9,311	2

26. In addition, Spectra has supplied data providing the number of access lines, disaggregation zone location, exchange population, exchange area, and exchange density data which calculated exchange population based upon census block information and mapping software, for the 107 exchanges in this study area. I have reviewed this information, which follows, and it appears reasonably accurate:

Wire Center			Zone	Population	Area (mi2)	Density (pop/mi2)
Macon			1	7,831	125.3	62.5
Aurora			1	10,082	69.9	144.3
Savannah			1	7,281	73.2	99.4
Cameron			1	10,806	127.8	84.5
Mount Vernon			1	7,517	121.4	61.9
Concordia			1	3,802	105.7	36.0
Mountain Grove			1	8,254	183.6	44.9
Canton			1	4,040	110.0	36.7
Palmyra			1	5,794	149.3	38.8
Monroe City			1	4,136	160.9	25.7
Potosi			1	13,778	311.2	44.3
Brunswick			1	1,500	94.1	15.9
Kahoka			1	3,533	107.6	32.8
<b>Zone 1</b>						<b>50.8</b>
Houston			2	5,562	193.4	28.8
Lagrange			2	1,815	66.9	27.1
Plattsburg			2	3,856	130.6	29.5
Lawson			2	6,127	96.9	63.3
Greenfield			2	2,891	103.0	28.1
Shelbina			2	3,082	161.8	19.0
Hamilton			2	2,945	111.1	26.5
Ironton			2	6,867	264.9	25.9

Sarcoxie			2	3,946	106.8	37.0
Eldorado Springs			2	8,535	297.5	28.7
Gower			2	2,618	71.4	36.7
<b>Lewistown</b>			<b>2</b>	<b>1,048</b>	<b>65.6</b>	<b>16.0</b>
Avenue City			2	670	22.0	30.5
Nebo			2	1,155	165.9	7.0
Laddonia			2	1,074	84.6	12.7
Irondale			2	1,528	37.4	40.9
Licking			2	4,881	221.8	22.0
Braymer			2	1,617	86.6	18.7
Trimble			2	781	12.7	61.6
Humansville			2	2,819	113.1	24.9
Birch Tree			2	2,551	158.8	16.1
Paris			2	2,900	186.6	15.5
Stewartsville			2	1,238	46.8	26.5
Van Buren			2	2,402	220.5	10.9
Winona			2	2,416	173.3	13.9
Lesterville			2	593	75.3	7.9
La Plata			2	3,021	204.3	14.8
Weableau			2	1,019	52.0	19.6
Wayland			2	1,778	105.0	16.9
Bolckow			2	563	46.2	12.2
Raymondville			2	1,056	62.4	16.9
Easton			2	732	23.9	30.7
Clarence			2	1,909	149.7	12.7
Perry			2	1,418	121.2	11.7
Osceola			2	2,972	164.3	18.1
Rosendale			2	793	44.1	18.0
Helena			2	726	29.3	24.7
Maysville			2	3,121	194.9	16.0
Golden City			2	2,075	151.8	13.7
Clarksdale			2	797	41.6	19.2
Osborn			2	767	51.0	15.0
Annapolis			2	1,886	148.0	12.7
West Quincy			2	79	16.4	4.8
Belgrade			2	789	63.5	12.4
Amazonia			2	1,050	32.1	32.7
Keytesville			2	938	69.0	13.6
Elsinore			2	2,188	139.0	15.7
Bellevue			2	886	96.2	9.2
Shelbyville			2	1,053	91.2	11.5
Caledonia			2	991	46.5	21.3
Hartville			2	3,175	158.8	20.0
Eminence			2	2,031	300.7	6.8
Sheldon			2	1,343	102.0	13.2
Jericho Springs			2	1,181	114.2	10.3
Norwood			2	2,243	105.5	21.3
Lowry City			2	2,568	151.4	17.0
<b>Labelle</b>			<b>2</b>	<b>1,102</b>	<b>105.6</b>	<b>10.4</b>

Cosby			2	439	18.4	23.9
<b>Ewing</b>			<b>2</b>	<b>940</b>	<b>37.2</b>	<b>25.3</b>
Fillmore			2	617	60.1	10.3
Turney			2	389	20.3	19.2
Everton			2	1,352	68.6	19.7
Kidder			2	909	61.3	14.8
Roby			2	2,385	204.8	11.6
Milo			2	1,152	79.2	14.6
Gorin			2	456	45.5	10.0
Collins			2	1,120	85.5	13.1
Edgar Springs			2	2,379	235.5	10.1
Kingston			2	1,158	82.7	14.0
Walker			2	1,000	79.1	12.6
Schell City			2	1,166	114.8	10.2
Revere			2	464	51.3	9.0
Grovespring			2	1,594	109.5	14.6
Elmer			2	316	55.2	5.7
Avilla			2	1,702	122.2	13.9
Dadeville			2	1,016	78.4	13.0
Bronaugh			2	1,092	103.9	10.5
Bunker			2	1,495	221.2	6.8
Boss			2	741	107.9	6.9
Manes			2	1,483	158.8	9.3
Whitesville			2	474	45.3	10.5
Centerville			2	502	71.3	7.0
Rockville			2	746	109.1	6.8
Dalton			2	90	23.2	3.9
Hunnewell			2	601	63.6	9.5
Arcola			2	405	53.0	7.6
Vanzant			2	1,325	140.5	9.4
Oates			2	859	150.5	5.7
Monticello			2	391	59.9	6.5
Fremont			2	374	90.5	4.1
Montauk			2	500	64.0	7.8
Santa Fe			2	358	37.6	9.5
Timber			2	257	112.5	2.3
Stoutsville			2	240	34.9	6.9
<b>Zone 2</b>						<b>15.9</b>
<b>Total Spectra</b>						<b>21.2</b>

27. Lewistown, Ewing, and LaBelle are lower density exchanges within Spectra's study area.

28. Spectra receives support from the USF in its study area which, according to Spectra's self certified disaggregation plan, amounts to \$10.80 per line per month.

29. Spectra has disaggregated support for the 107 exchanges constituting Spectra's study area. Spectra has established two cost zones in its disaggregation plan, Zone 1 and Zone 2. Support available in the Zone 1 exchanges is \$3.59 per line per month. Support available in the Zone 2 exchanges is \$15.21 per line per month. Zone 1 consists of 13 exchanges. Zone 2 consists of 94 exchanges. The Zone 1 exchanges range from 947 to 7,252 access lines. The Zone 2 exchanges range from 57 to 4,786 access lines. Ewing, LaBelle, and Lewistown are Zone 2 exchanges.

30. By reducing the level of support available in Zone 1 exchanges compared to Zone 2 exchanges, Spectra's disaggregation plan minimized the likelihood that a competitive ETC such as Mark Twain could serve in a higher-density wire center or exchange and receive the level of average cost support that Spectra receives throughout Spectra's study area.

31. In providing service in Ewing, LaBelle, and Lewistown, Mark Twain did not seek to serve the lower-cost, higher-revenue customers within Spectra's study area. Mark Twain serves the higher-cost customers within Spectra's study area. Mark Twain does not "cream skim" any low-cost, high density Spectra study area exchanges.

32. Mark Twain's provision of service in the three exchanges of Ewing, La Belle, and Lewistown has created, and continues to provide, increased choice of competitive providers and competitive services to subscribers in those three exchanges. The continued availability of the offerings of Spectra and Mark Twain will give customers in these three exchanges the advantages of each provider's service offerings.

33. Spectra has utilized Mark Twain's provision of service to customers in these three exchanges to receive an Order from the Missouri Public Service Commission designating these three exchanges as competitive for purposes of 2005 Senate Bill 237 in IO-2006-0108, releasing Spectra from several restrictions imposed upon traditional incumbent local exchange companies.

34. Mark Twain has captured a significant number of customers in the exchanges of Ewing, LaBelle, and Lewistown.

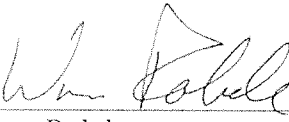
35. The impact on the federal universal service fund if Mark Twain's service area is defined as the exchanges of Ewing, La Belle, and Lewistown will not be great. If Mark Twain captured all access lines in these three exchanges, the maximum federal universal support Mark Twain would receive would be approximately \$12,640 per month. This theoretical maximum is less than one-fifteenth of the amount that the FCC found in its *Virginia Cellular*<sup>1</sup> decision would not overburden the fund.

36. Mark Twain's continued receipt of federal universal service support will not reduce the amount of universal service support Spectra receives. Spectra will continue to receive universal service support for lines it continues to serve, as well as for lines captured by Mark Twain. Granting Mark Twain ETC status will not undermine the ability of Spectra to continue to provide universal service in its study area.

37. Further affiant sayeth not.

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<sup>1</sup> In the Matter of the Federal State Joint Board on Universal Service, Virginia Cellular, LLC, Petition for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Virginia, December 31, 2003 Memorandum Report and Order, CC Docket No. 96-95.

  
\_\_\_\_\_  
William Rohde

STATE OF MISSOURI           )  
  )  
COUNTY OF KNOX           )

(notary seal)

Before me this 2nd day of December, 2005, personally appeared William Rohde, duly sworn and on his oath deposed and said the foregoing affidavit was true to the best of his knowledge, information, and belief.

  
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Notary Public

RICHARD L. HALE  
Notary Public - State of Missouri  
Adair County  
My Commission Expires: May 31, 2008



**Universal Service Administrative Company**  
High Cost & Low Income Division

Karen Majcher  
Vice President, High Cost & Low Income Division

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August 1, 2005

William Rohde  
Executive Vice President & General Manager  
Mark Twain Communications Company  
Highway 6 East  
P.O. Box 128  
Hurdland, MO 63547

RE: High Cost Support for Mark Twain Communications Company and  
Redefinition of Rural Service Areas under Section 54.207 of the Federal  
Communications Commission

Dear Mr. Rohde:

This letter addresses issues relating to Mark Twain Communications Company (Mark Twain) universal service high cost support for the Spectra Communications Group, LLC's (Spectra) wire centers of Ewing, La Belle, and Lewistown.

Mark Twain was designated as an eligible telecommunications carrier (ETC) for the purposes of receiving universal service support by the Missouri Public Service Commission (PSC) on June 27, 2000, in Case No. TA-2000-591. The Missouri PSC order did not specify which wire centers were eligible for universal service support. In a July 7, 2000, notification filing with the Federal Communications Commission (FCC), Mark Twain identified three wire centers where it served lines and sought universal service support. The wire centers identified were La Belle, which was served at the time by non-rural incumbent carrier GTE Midwest, Inc. and the wire centers of Ewing and Lewistown, which were served at the time by the rural carrier GTE Arkansas, Inc.

On July 27, 2000, the FCC approved the sale of the three exchanges (as well as others) from GTE Midwest, Inc. to Spectra. Under the FCC's rules, a carrier that acquires telephone exchanges from an unaffiliated carrier receives high cost support for the acquired exchanges at the same per-line support levels for which those exchanges were eligible prior to the transfer of the exchanges. (See Section 54.305 of the FCC's rules). This means that the high cost loop (HCL) support for the three exchanges was frozen as of July 27, 2000, under the acquired exchange provision of the rules.

Mark Twain thus received the same per-line support that Spectra had been entitled to when it acquired the exchanges from GTE. Mark Twain received this HCL support until July 2003, when USAC implemented a new payment system that inadvertently stopped paying HCL support to Mark Twain. By the time the solution to reinstate Mark Twain's

Mr. Rohde  
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HCL support was discovered, USAC considered Mark Twain subject to the service area redefinition provisions of Section 54.207 of the FCC's rules for the Ewing and Lewistown exchanges as they were rural wire centers (the only exchanges with acquired exchange HCL support).

Under the FCC's rules, the service area served by a rural telephone company means that company's study area "unless and until the FCC and the states...establish a different definition of service area for such company" (See Section 54.207(b) of the FCC's rules). If a state commission proposes to redefine a service area served by a rural telephone company so that a competitor can serve selected wire centers, the state commission or the carrier must petition the FCC for approval of the proposed redefinition under Section 54.207 of the FCC's rules. Thus, the Missouri PSC or Mark Twain was required to seek redefinition for the wire centers of Ewing and Lewistown served by the rural carrier GTE Arkansas, Inc. Until a redefinition is agreed to by the FCC, the Ewing and Lewistown wire centers are not be eligible to receive High Cost support.

Even though Mark Twain was not eligible for HCL support in Ewing and Lewistown, it did receive high cost support for those wire centers until June 2003. Payments were, however, continued for ICLS because the three wire centers (both rural and non-rural) Mark Twain serves are in the same disaggregation Zone under Spectra's plan as implemented subsequent to the GTE transaction. As all ICLS must be filed at the disaggregated level, (i.e. by zone) there is no way to differentiate the formerly rural and non-rural wire centers as they existed prior to the Spectra sale. As such, USAC continues to pay Mark Twain ICLS subject to future direction by the FCC.

Presently, USAC is awaiting guidance from the FCC on a number of Section 54.207 related issues, including those related to Mark Twain. Until such time that FCC guidance is provided on how USAC should proceed, USAC will not change Mark Twain's current eligibility and no prior period dollars will be recovered.

If you have any questions, please feel free to call me at 202-776-0200.

Sincerely,



Karen Majcher  
Vice President  
High Cost & Low Income Division