

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Review of the) **File No. TO-2022-0178**
Relay Missouri Surcharge)

**STAFF RESPONSE TO MISSOURI CABLE
TELECOMMUNICATIONS ASSOCIATION COMMENTS**

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Response to Missouri Cable Telecommunications Association Comments* in this matter hereby states:

1. On January 3, 2022, Staff filed a report and motion to open a file concerning the Deaf Relay Service and Equipment Distribution Fund Surcharge. The next day, the Commission issued an Order and Notice directing any party wishing to respond to Staff’s report to do so by January 31, 2022. On February 1, 2022, the Missouri Cable Telecommunications Association (“MCTA”) filed comments concerning Staff’s report. On February 2, 2022, the Commission ordered Staff to respond to MCTA’s comments no later than February 16, 2022.

2. In its comments, MCTA suggests a phase-in approach over several years to increase the surcharge rate. Specifically, MCTA recommends that the surcharge increase from \$.04 to \$.06 in 2022, from \$.06 to \$.08 in 2023, and from \$.08 to \$.10 in 2024. Staff reviewed MCTA’s comments and provides a full analysis of MCTA’s comments in its Staff’s Memorandum, attached here as Appendix A. Staff affirms its initial recommendation to increase the surcharge from \$.04 to \$.10. However, if the Commission decides to adopt a phase-in

approach, the initial surcharge increase should exceed \$.06 and subsequent increases will need to raise the surcharge level beyond \$.10. An initial surcharge increase of \$.02 or less puts the fund balance below the target range by the end of this year and can bankrupt the fund as early as 2024. Staff analyzed 19 different scenarios and its monthly impact through 2025 on the fund balance in Surcharge Scenarios, attached here as Attachment A.

WHEREFORE, Staff respectfully submits this recommendation and attachment and prays that the Commission will accept Staff's initial recommendation to increase the current Fund surcharge amount from \$.04 per month to \$.10 per month, and grant such other and further relief as the Commission considers just in the circumstances.

/s/ Ron Irving

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 16th day of February, 2022, to all counsel of record.

/s/ Ron Irving

MEMORANDUM

To: Official Case File
Case No. TO-2022-0178

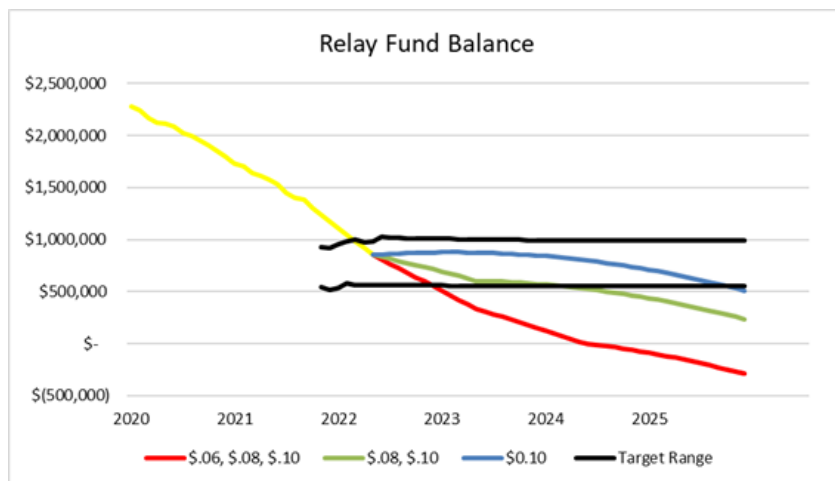
From: Kari Salsman, Senior Research/Data Analyst
John Van Eschen, Regulatory Compliance Manager
Telecommunications Department

Subject: Response to MCTA Comments

Date: February 16, 2022

This memorandum provides Missouri Public Service Commission Staff (Staff) responses to the Comments submitted by the Missouri Cable Telecommunications Association (MCTA). MCTA recommends the Commission adopt a phase-in approach to surcharge increases. Specifically, MCTA recommends the surcharge be increased from \$.04 to \$.06 in 2022, \$.06 to \$.08 in 2023 and from \$.08 to \$.10 in 2024, unless a new funding source is identified. MCTA claims a phased-in approach will minimize impacts for consumers and providers, and can be accomplished with little risk.

In an attempt to analyze any phase-in approach, Staff used the same technical assumptions described in Staff's initial recommendation; however, Staff delayed higher surcharge revenues reflected in Staff's projections to June 2022 rather than May 2022.¹ Below is a graph showing projected fund balances for three scenarios with the target range²:



¹ June represents the earliest the fund could realistically see higher revenues through increasing the surcharge. This timing is based on companies billing the higher surcharge level in May after being provided with at least 60 days advance notice of the surcharge level change. Any subsequent surcharge increases would occur twelve months later.

² The three scenarios start diverging in mid-2022 and reflect MCTA's proposal, a scenario increasing the surcharge from \$.04 to \$.08 and then \$.10 and Staff's recommendation to increase the surcharge from \$.04 to \$.10.

This graph shows how all three scenarios dip below the minimum desired target range at some point and continue to trend downward; however, perhaps most notable is MCTA's proposal results in the fund balance becoming negative by June 2024.

Staff explored 19 different approaches. Attachment A provides the monthly fund balance projections for each approach through December 2025. The Attachment is color-coded to reflect whether the indicated fund balance is within the desired target range. Some basic observations about phasing-in surcharge increases are that the fund balance dips below the minimum target range sooner with a lower initial surcharge level. For example, MCTA's proposal causes the fund balance to cross below the desired target range by December 2022 versus November 2025 for Staff's proposal to increase the surcharge from \$.04 to \$.10. A second observation is a lower initial surcharge level can ultimately lead to a surcharge level much higher than \$.10 in the future in order to prevent the fund from becoming bankrupt and/or allow the fund balance to be within the target range. For example, if the Commission adopts an initial surcharge level of \$.06 the surcharge will eventually need to be increased to \$.14 or \$.15 in order to enable the fund balance to be within the target range by the end of 2025.

If the Commission desires to phase-in surcharge increases then Staff recommends the Commission not consider any proposal where the surcharge is initially increased to any amount of \$.06 or lower.³ If the initial surcharge is increased to \$.07 or \$.08 then the Commission should be prepared to increase the surcharge a year later to \$.12 or \$.13. An initial surcharge increase to \$.09 would mean that the surcharge would need to increase to \$.10 or \$.11 a year later. Specific preference for any of these phased-in proposals will depend on tolerance for allowing the fund balance to dip below the desired target range.

MCTA is also suggesting the Commission request supplemental authority from the General Assembly for reimbursement of expenses associated with the Covid-19 pandemic. Presumably, MCTA's recommendation is based on a sentence contained in Staff's initial memo stating, "...The pandemic resulted in an increase in relay service usage, along with a significant increase in the usage of RCC service."⁴ Staff offered this statement by observing RCC annual expense jumping from \$2,934 in 2019 to \$24,254 in 2020 and made the conjecture the pandemic may have caused an increase in conference calling. Expenses for relay, CapTel and RCC services increased by a total of \$54,853 from 2019 to 2020, but overall expenses declined by \$225,290. These different impacts make it difficult to determine the appropriateness of seeking Covid relief funding, but if pursued, the amount sought would only be a small portion of total expenses. More importantly, Covid relief funding is likely a one-time payment and not a long term funding source.

³ As shown in Attachment A, an initial surcharge of \$.06 causes the fund balance to be significantly below the desired target for several years. Moreover, depending on subsequent surcharge increases the fund can even become bankrupt.

⁴ Staff Report and Motion to Open Docket Regarding Relay Missouri Surcharge; page 4. RCC refers to Relay Conference Captioning service which is specialized conference calling service designed for deaf and hearing impaired consumers.

MCTA also suggests, "...It is unclear there are any spikes in expenses in the past or in the future that would require a balance of more than six times the maximum monthly expenditure..." This comment appears to suggest a fund balance target range of between five and nine months' worth of expenses may be excessive. Staff notes the target range of five to nine months' of expenses is based on direction given by the Missouri Universal Service Fund Board for the Missouri Universal Service Fund (Missouri USF). Staff has simply applied the same desired target range for both the Missouri USF and Relay Missouri funds. Regardless, at this time the critical issue is the minimum level for a desired target fund balance. MCTA does not appear to be questioning the minimum amount of five months' worth of expenses for the minimum target range.

One last comment made by MCTA is the fund has long-term structural insufficiencies. MCTA states, "...Land telephone lines no longer remain a sustainable mechanism for funding the Relay Missouri program." Staff agrees with MCTA's assessment; however, any changes to funding the Relay Missouri fund would require changing Missouri's statutes.⁵ The Missouri Commission may want to solicit feedback from interested parties on what specific legislation should be considered.

Summary

This memorandum provides Staff's response to MCTA's comments. Overall, Staff maintains its initial recommendation to increase the Relay Missouri surcharge from \$.04 to \$.10.⁶ Although this proposed increase to the surcharge appears large, the Commission should be aware of prior levels for the Relay Missouri surcharge. The surcharge has fluctuated through the years and has been higher than \$.10.⁷ Nevertheless if the Commission wants to pursue a phased-in approach then Staff has provided alternative recommendations for its consideration.

⁵ Chapter 209.255 is the relevant Missouri statute directing how the fund should be assessed.

⁶ Likewise Staff maintains its recommendation to maintain the current retention amount as described in Staff's prior filing.

⁷ For example the Relay Missouri surcharge was \$.13 September 1, 2005 to March 2, 2011 and \$.11 from March 3, 2011 to June 30, 2013. See Case Nos. TO-2005-0308 and TO-2009-0042.

Surcharge Scenarios

Fund Balance Within Target Range
 Fund Balance Below Target Range

Monthly Fund Balance Projections

		.06..08..10	.06..08..15	.06..09..10	.06..09..14	.07..08..10	.07..08..15	.07..09..10	.07..09..14	.07..10	.07..12	.08..09..10	.08..09..13	.08..10	.08..13	.09 2 years..10	.09 2 years..12	.09..10	.09..11	010		
2022	January	\$ 1,109,043	\$ 1,109,043	\$ 1,109,043	\$ 1,109,043	\$ 1,109,043	\$ 1,109,043	\$ 1,109,043	\$ 1,109,043	\$ 1,109,043	\$ 1,109,043	\$ 1,109,043	\$ 1,109,043	\$ 1,109,043	\$ 1,109,043	\$ 1,109,043	\$ 1,109,043	\$ 1,109,043	\$ 1,109,043	\$ 1,109,043		
	February	\$ 1,044,667	\$ 1,044,667	\$ 1,044,667	\$ 1,044,667	\$ 1,044,667	\$ 1,044,667	\$ 1,044,667	\$ 1,044,667	\$ 1,044,667	\$ 1,044,667	\$ 1,044,667	\$ 1,044,667	\$ 1,044,667	\$ 1,044,667	\$ 1,044,667	\$ 1,044,667	\$ 1,044,667	\$ 1,044,667	\$ 1,044,667		
	March	\$ 980,138	\$ 980,138	\$ 980,138	\$ 980,138	\$ 980,138	\$ 980,138	\$ 980,138	\$ 980,138	\$ 980,138	\$ 980,138	\$ 980,138	\$ 980,138	\$ 980,138	\$ 980,138	\$ 980,138	\$ 980,138	\$ 980,138	\$ 980,138	\$ 980,138	\$ 980,138	
	April	\$ 915,449	\$ 915,449	\$ 915,449	\$ 915,449	\$ 915,449	\$ 915,449	\$ 915,449	\$ 915,449	\$ 915,449	\$ 915,449	\$ 915,449	\$ 915,449	\$ 915,449	\$ 915,449	\$ 915,449	\$ 915,449	\$ 915,449	\$ 915,449	\$ 915,449	\$ 915,449	
	May	\$ 850,597	\$ 850,597	\$ 850,597	\$ 850,597	\$ 850,597	\$ 850,597	\$ 850,597	\$ 850,597	\$ 850,597	\$ 850,597	\$ 850,597	\$ 850,597	\$ 850,597	\$ 850,597	\$ 850,597	\$ 850,597	\$ 850,597	\$ 850,597	\$ 850,597	\$ 850,597	
	June	\$ 809,127	\$ 809,127	\$ 809,127	\$ 809,127	\$ 820,903	\$ 820,903	\$ 820,903	\$ 820,903	\$ 820,903	\$ 820,903	\$ 820,903	\$ 820,903	\$ 832,678	\$ 832,678	\$ 832,678	\$ 832,678	\$ 844,454	\$ 844,454	\$ 844,454	\$ 844,454	\$ 856,230
	July	\$ 767,330	\$ 767,330	\$ 767,330	\$ 767,330	\$ 790,804	\$ 790,804	\$ 790,804	\$ 790,804	\$ 790,804	\$ 790,804	\$ 790,804	\$ 814,278	\$ 814,278	\$ 814,278	\$ 814,278	\$ 837,753	\$ 837,753	\$ 837,753	\$ 837,753	\$ 861,227	
	August	\$ 725,201	\$ 725,201	\$ 725,201	\$ 725,201	\$ 760,297	\$ 760,297	\$ 760,297	\$ 760,297	\$ 760,297	\$ 760,297	\$ 795,394	\$ 795,394	\$ 795,394	\$ 795,394	\$ 795,394	\$ 830,491	\$ 830,491	\$ 830,491	\$ 830,491	\$ 865,588	
	September	\$ 682,737	\$ 682,737	\$ 682,737	\$ 682,737	\$ 729,380	\$ 729,380	\$ 729,380	\$ 729,380	\$ 729,380	\$ 729,380	\$ 776,024	\$ 776,024	\$ 776,024	\$ 776,024	\$ 776,024	\$ 822,667	\$ 822,667	\$ 822,667	\$ 822,667	\$ 869,310	
	October	\$ 639,935	\$ 639,935	\$ 639,935	\$ 639,935	\$ 698,050	\$ 698,050	\$ 698,050	\$ 698,050	\$ 698,050	\$ 698,050	\$ 756,164	\$ 756,164	\$ 756,164	\$ 756,164	\$ 756,164	\$ 814,278	\$ 814,278	\$ 814,278	\$ 814,278	\$ 872,393	
	November	\$ 596,792	\$ 596,792	\$ 596,792	\$ 596,792	\$ 666,303	\$ 666,303	\$ 666,303	\$ 666,303	\$ 666,303	\$ 666,303	\$ 735,813	\$ 735,813	\$ 735,813	\$ 735,813	\$ 735,813	\$ 805,324	\$ 805,324	\$ 805,324	\$ 805,324	\$ 874,835	
	December	\$ 553,304	\$ 553,304	\$ 553,304	\$ 553,304	\$ 634,136	\$ 634,136	\$ 634,136	\$ 634,136	\$ 634,136	\$ 634,136	\$ 714,969	\$ 714,969	\$ 714,969	\$ 714,969	\$ 714,969	\$ 795,802	\$ 795,802	\$ 795,802	\$ 795,802	\$ 876,634	
2023	January	\$ 509,468	\$ 509,468	\$ 509,468	\$ 509,468	\$ 601,549	\$ 601,549	\$ 601,549	\$ 601,549	\$ 601,549	\$ 601,549	\$ 693,630	\$ 693,630	\$ 693,630	\$ 693,630	\$ 693,630	\$ 785,711	\$ 785,711	\$ 785,711	\$ 785,711	\$ 877,791	
	February	\$ 465,281	\$ 465,281	\$ 465,281	\$ 465,281	\$ 568,537	\$ 568,537	\$ 568,537	\$ 568,537	\$ 568,537	\$ 568,537	\$ 671,793	\$ 671,793	\$ 671,793	\$ 671,793	\$ 671,793	\$ 775,049	\$ 775,049	\$ 775,049	\$ 775,049	\$ 878,304	
	March	\$ 420,741	\$ 420,741	\$ 420,741	\$ 420,741	\$ 535,099	\$ 535,099	\$ 535,099	\$ 535,099	\$ 535,099	\$ 535,099	\$ 649,457	\$ 649,457	\$ 649,457	\$ 649,457	\$ 649,457	\$ 763,815	\$ 763,815	\$ 763,815	\$ 763,815	\$ 878,173	
	April	\$ 375,845	\$ 375,845	\$ 375,845	\$ 375,845	\$ 501,233	\$ 501,233	\$ 501,233	\$ 501,233	\$ 501,233	\$ 501,233	\$ 626,620	\$ 626,620	\$ 626,620	\$ 626,620	\$ 626,620	\$ 752,008	\$ 752,008	\$ 752,008	\$ 752,008	\$ 877,396	
	May	\$ 330,590	\$ 330,590	\$ 330,590	\$ 330,590	\$ 466,936	\$ 466,936	\$ 466,936	\$ 466,936	\$ 466,936	\$ 466,936	\$ 603,281	\$ 603,281	\$ 603,281	\$ 603,281	\$ 603,281	\$ 739,627	\$ 739,627	\$ 739,627	\$ 739,627	\$ 875,972	
	June	\$ 306,665	\$ 306,665	\$ 317,511	\$ 317,511	\$ 443,051	\$ 443,051	\$ 453,897	\$ 453,897	\$ 464,743	\$ 486,344	\$ 590,284	\$ 590,284	\$ 601,129	\$ 611,975	\$ 726,670	\$ 726,670	\$ 737,516	\$ 748,362	\$ 873,902		
	July	\$ 282,234	\$ 282,234	\$ 303,855	\$ 303,855	\$ 418,662	\$ 418,662	\$ 440,282	\$ 440,282	\$ 461,903	\$ 505,144	\$ 576,710	\$ 576,710	\$ 598,330	\$ 619,951	\$ 713,137	\$ 713,137	\$ 734,578	\$ 756,379	\$ 871,185		
	August	\$ 257,297	\$ 257,297	\$ 289,622	\$ 289,622	\$ 393,765	\$ 393,765	\$ 426,090	\$ 426,090	\$ 458,416	\$ 523,066	\$ 562,559	\$ 562,559	\$ 594,884	\$ 627,209	\$ 699,027	\$ 699,027	\$ 731,352	\$ 763,677	\$ 867,821		
	September	\$ 231,851	\$ 231,851	\$ 274,811	\$ 274,811	\$ 368,360	\$ 368,360	\$ 411,320	\$ 411,320	\$ 454,280	\$ 540,200	\$ 547,830	\$ 547,830	\$ 590,790	\$ 633,749	\$ 684,339	\$ 684,339	\$ 727,299	\$ 770,259	\$ 863,808		
	October	\$ 205,896	\$ 205,896	\$ 259,421	\$ 259,421	\$ 342,446	\$ 342,446	\$ 395,972	\$ 395,972	\$ 449,497	\$ 556,547	\$ 532,522	\$ 532,522	\$ 586,047	\$ 639,572	\$ 669,072	\$ 669,072	\$ 722,597	\$ 776,122	\$ 859,147		
	November	\$ 179,431	\$ 179,431	\$ 243,452	\$ 243,452	\$ 316,022	\$ 316,022	\$ 380,043	\$ 380,043	\$ 444,065	\$ 572,108	\$ 516,634	\$ 516,634	\$ 580,656	\$ 644,678	\$ 653,226	\$ 653,226	\$ 717,247	\$ 781,269	\$ 853,838		
	December	\$ 152,453	\$ 152,453	\$ 226,903	\$ 226,903	\$ 289,085	\$ 289,085	\$ 363,535	\$ 363,535	\$ 437,985	\$ 586,884	\$ 500,167	\$ 500,167	\$ 574,617	\$ 649,066	\$ 636,799	\$ 636,799	\$ 711,249	\$ 785,698	\$ 847,881		
2024	January	\$ 124,964	\$ 124,964	\$ 209,773	\$ 209,773	\$ 261,637	\$ 261,637	\$ 346,446	\$ 346,446	\$ 431,256	\$ 600,875	\$ 483,119	\$ 483,119	\$ 567,929	\$ 652,738	\$ 619,792	\$ 619,792	\$ 704,602	\$ 789,411	\$ 841,275		
	February	\$ 96,960	\$ 96,960	\$ 192,062	\$ 192,062	\$ 233,675	\$ 233,675	\$ 328,776	\$ 328,776	\$ 423,878	\$ 614,082	\$ 475,758	\$ 475,758	\$ 560,592	\$ 655,694	\$ 602,205	\$ 602,205	\$ 697,307	\$ 792,408	\$ 834,021		
	March	\$ 68,443	\$ 68,443	\$ 173,770	\$ 173,770	\$ 205,198	\$ 205,198	\$ 310,525	\$ 310,525	\$ 415,853	\$ 626,507	\$ 467,747	\$ 467,747	\$ 552,608	\$ 657,935	\$ 584,036	\$ 584,036	\$ 689,363	\$ 794,690	\$ 826,118		
	April	\$ 39,410	\$ 39,410	\$ 154,896	\$ 154,896	\$ 176,207	\$ 176,207	\$ 291,693	\$ 291,693	\$ 407,179	\$ 638,151	\$ 459,089	\$ 459,089	\$ 543,975	\$ 659,461	\$ 565,285	\$ 565,285	\$ 680,771	\$ 796,257	\$ 817,567		
	May	\$ 9,862	\$ 9,862	\$ 135,441	\$ 135,441	\$ 146,699	\$ 146,699	\$ 272,278	\$ 272,278	\$ 397,857	\$ 649,014	\$ 449,783	\$ 449,783	\$ 534,694	\$ 660,273	\$ 545,952	\$ 545,952	\$ 671,531	\$ 797,110	\$ 808,368		
	June	\$ (224)	\$ 49,722	\$ 125,392	\$ 165,349	\$ 176,611	\$ 176,611	\$ 262,270	\$ 302,228	\$ 387,887	\$ 659,098	\$ 439,828	\$ 469,796	\$ 524,765	\$ 660,371	\$ 536,027	\$ 556,006	\$ 661,643	\$ 797,249	\$ 798,522		
	July	\$ (10,958)	\$ 88,609	\$ 114,696	\$ 194,350	\$ 125,961	\$ 205,615	\$ 251,616	\$ 331,269	\$ 377,270	\$ 668,404	\$ 429,227	\$ 488,967	\$ 514,189	\$ 659,756	\$ 525,454	\$ 565,281	\$ 651,108	\$ 796,676	\$ 788,028		
	August	\$ (22,339)	\$ 126,524	\$ 103,353	\$ 222,443	\$ 114,622	\$ 233,712	\$ 240,313	\$ 359,404	\$ 366,005	\$ 676,934	\$ 417,978	\$ 507,296	\$ 502,966	\$ 658,430	\$ 514,234	\$ 573,779	\$ 639,926	\$ 795,390	\$ 776,886		
	September	\$ (34,366)	\$ 163,471	\$ 91,363	\$ 249,633	\$ 102,635	\$ 260,905	\$ 228,365	\$ 386,635	\$ 354,094	\$ 684,688	\$ 406,082	\$ 524,785	\$ 491,096	\$ 656,393	\$ 502,368	\$ 581,503	\$ 628,097	\$ 793,394	\$ 765,099		
	October	\$ (47,040)	\$ 199,452	\$ 78,727	\$ 275,921	\$ 90,002	\$ 287,196	\$ 215,770	\$ 412,963	\$ 341,537	\$ 691,668	\$ 393,541	\$ 541,436	\$ 478,579	\$ 653,645	\$ 489,855	\$ 588,452	\$ 615,622	\$ 790,688	\$ 752,665		
	November	\$ (60,360)	\$ 234,470	\$ 65,445	\$ 301,309	\$ 76,724	\$ 312,588	\$ 202,529	\$ 438,393	\$ 328,334	\$ 697,876	\$ 380,353	\$ 557,251	\$ 465,417	\$ 650,188	\$ 476,696	\$ 594,628	\$ 602,501	\$ 787,272	\$ 739,585		
	December	\$ (74,325)	\$ 268,528	\$ 51,518	\$ 325,800	\$ 62,800	\$ 337,082	\$ 188,643	\$ 462,925	\$ 314,486	\$ 703,312	\$ 366,521	\$ 572,232	\$ 451,610	\$ 646,023	\$ 462,893	\$ 600,033	\$ 588,735	\$ 783,148	\$ 725,860		
2025	January	\$ (88,934)	\$ 301,627	\$ 36,946	\$ 349,395	\$ 48,232	\$ 380,681	\$ 174,112	\$ 486,561	\$ 299,993	\$ 707,978	\$ 352,043	\$ 586,380	\$ 437,159	\$ 641,151	\$ 448,444	\$ 604,669	\$ 574,325	\$ 778,317	\$ 711,491		
	February	\$ (104,187)	\$ 333,772	\$ 21,731	\$ 372,098	\$ 33,020	\$ 383,387	\$ 158,938	\$ 509,306	\$ 284,856	\$ 711,876	\$ 336,922	\$ 599,698	\$ 422,063	\$ 635,573	\$ 433,352	\$ 608,536	\$ 559,270	\$ 772,780	\$ 696,477		
	March	\$ (120,084)	\$ 364,965	\$ 5,872	\$ 393,911	\$ 17,164	\$ 405,203	\$ 143,120	\$ 531,159	\$ 269,076	\$ 715,008	\$ 321,158	\$ 612,187	\$ 406,324	\$ 629,290	\$ 417,617	\$ 611,636	\$ 543,573	\$ 766,538	\$ 680,821		
	April	\$ (136,624)	\$ 395,208	\$ (10,630)	\$ 414,836	\$ 666	\$ 426,132	\$ 126,660	\$ 552,125	\$ 252,653	\$ 717,374	\$ 304,751	\$ 623,850	\$ 389,943	\$ 622,303	\$ 401,239	\$ 613,971	\$ 527,232	\$ 759,592	\$ 664,522		
	May	\$ (153,805)	\$ 424,506	\$ (27,773)	\$ 434,875	\$ (16,474)	\$ 446,174	\$ 109,557	\$ 572,206	\$ 235,589	\$ 718,976	\$ 287,702	\$ 634,688	\$ 372,920	\$ 614,613	\$ 384,219	\$ 615,543	\$ 510,250	\$ 751,944	\$ 647,581		
	June	\$ (171,627)	\$ 452,859	\$ (45,558)	\$ 454,031	\$ (34,255)	\$ 465,334	\$ 91,814	\$ 591,403	\$ 217,883	\$ 71											