## Happy, Kim

**Subject:** FW: TU-2005-0358, Alma Financing

Attachments: atcsqs.doc

**From:** Craig Johnson [mailto:cjohnson@aempb.com]

**Sent:** Wednesday, June 08, 2005 9:16 AM

To: Kevin Thompson

Cc: Robert Franson; Andy Heins

Subject: TU-2005-0358, Alma Financing

Judge Thompson:

I apologize for not being present at the June 7 agenda. Alma Manager Andy Heins and myself do plan on being present Thursday.

I obtained what I believe is at least a partial list of Commissioner questions. I have taken the liberty of attaching a document setting forth those questions, and Alma's responses thereto. It is my hope that these will facilitate the discussion at Agenda Thursday. Please circulate this email with the attachment to the Commissioners.

I am copying in Staff.

Craig S. Johnson Andereck, Evans, Milne, Peace, and Johnson, LLC.

The information contained in this e-mail transmission is legally privileged, confidential, may be attorney-client privileged, may constitute attorney work-product. The information is intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, or responsible for the delivery of this message to the intended recipient, you are hereby notified that any dissemination, distribution, copying or other use of this information, including any attachments, is strictly prohibited and may be unlawful. If you have received this message in error, please promptly and completely delete this message. Please also call 573-634-3422 to report the misdirected communication. Thank you.

The Missouri Bar Disciplinary Counsel requires Missouri Lawyers to notify recipients of e-mail that e-mail is not a secure method of communication. E-mail sent to you or by you may be copied and held by various computers it passes through. Persons not participating in our communications may intercept them by improperly accessing your, my, or another's computer. I am communicating to you via e-mail because you have consented to receive e-mail communications from me. If you change your mind and want future communications sent via a different media, please advise me at once.

TU-2005-0358

Alma Telephone Company Responses to questions arising at June 7, 2005 Agenda.

How is the company going to repay this loan if the loan amounts to approximately \$16,000 per customer? Will Alma get more USF to help pay for this?

Alma understands the \$16,000 figure represents per customer recovery over 5 years. The loan period exceeds 20 years, so this figure appears to be somewhat overstated. The increased revenues needed to repay this loan will primarily come from increases in Federal USF Support. Alma will convert from a National Exchange Carrier Association (NECA) average schedule to a cost company. This conversion, and the new switch and fiber investment are calculated to increase Alma's Federal USF Support payments by more than \$600,000 per year by 2007. This increased USF support is a part of the financial analysis upon which the RUS loan application was submitted and approved, upon which this loan application was submitted, and upon which Staff's recommendation was based.

What is the impact of the inter carrier compensation docket? How will Alma repay the loan if/when access fees go away or are reduced?

The FCC unified intercarrier compensation docket is not expected to adversely effect the total revenues of Alma. If the FCC directs a reduction in Alma's (NECA's) interstate access rate, make-whole interstate revenues should be provided through either an increase in Federal USF support or a new rural/high cost support charge or fund.

If the FCC were to cause an reduction of interstate revenues without makewhole interstate revenues, the intrastate sources of replacement revenue would be the Missouri USF high cost fund, Missouri access rate increases, Missouri wireless termination rate increases, or local rate increases.

What is the impact of granting the LNP delays versus Alma needing the money? For example, if granted will we expect to see other LECS with LNP waivers come in and ask for similar loans or money?

Alma does not believe LNP delays impacts the analysis. The Maitel switch needs replacement because of lack of vendor support, and because of CALEA requirements. LNP capability is a minor factor dictating switch replacement. More LNP delays will not delay the necessity of switch replacement. Alma cannot state to what extent LNP requirements would result in other LECs requesting loans.

atcsqs 1

How much of the loan is for video services? Mo PSC doesn't regulated video? Does this have an impact?

None of the loan is for video service. Revenues and expenses associated with provisioning video service was not part of the loan analysis. Alma realizes that fiber to the home will enable the provision of data and video in addition to voice. However there is no business plan that attempts to calculate the customer demand for video, the programming costs, sustainable competitive price levels, or local franchise requirements. If video is offered, logic suggests it will have to be done either by Alma, or by a separate affiliate paying Alma for use of the fiber facilities.

Will Alma qualify for price cap regulation under SB237?

Alma believes there are two or more CMRS providers operating in its areas. If SB237 is signed into law, Alma does not anticipate electing to be price cap regulated.