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October 18, 1999

HAND DELIVERY

**Mr. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505**

**RE: Universal Service Generic Contested Case - Phase II
TRA Docket No. 97-00888**

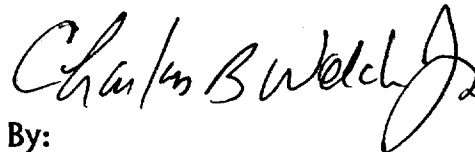
Dear Mr. Waddell:

Enclosed for filing, please find the original plus thirteen (13) copies of the Comments made by the Tennessee Cable Telecommunications Association, to be filed in the referenced proceeding. Copies are being served on parties of record.

If you have any questions or concerns with regard to this filing, please do not hesitate to contact me.

Very truly yours,

**FARRIS, MATHEWS,
BRANAN & HELLEN, P.L.C.**



**By:
Charles B. Welch, Jr.**

encs:

**cc: Carolyn Marek
Parties of Record**

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EXECUTIVE SECRETARY

FILE

BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

OCTOBER 18, 1999

IN RE: UNIVERSAL SERVICE) DOCKET NO. 97-00888
 PROCEEDING)

COMMENTS OF THE
TENNESSEE CABLE TELECOMMUNICATIONS ASSOCIATION

The Tennessee Cable Telecommunications Association ("TCTA"), through counsel, respectfully submits its comments regarding the Tennessee Regulatory Authority's ("TRA" or "Authority") Interim Order in Docket No. 97-00888 (Universal Service Proceeding, Phase II).

The TCTA wishes to commend the Authority for resolving many of the issues disputed by the parties during this proceeding to determine which high-cost proxy model should be adopted for estimating intrastate universal service support requirements. However, it is apparent from the revised cost studies submitted by BellSouth Telecommunications, Inc. ("BellSouth"), United Telephone Southeast, Inc. ("United"), and AT&T that the Authority's Interim Order fails to provide a basis to bridge the chasm of widely divergent funding levels. Indeed, the carriers' cost proxy models have generated disparate cost results and support requirements even with the numerous revisions to the input values prescribed by the Authority.

FILE

I. THE RECORD DEVELOPED IN THIS PROCEEDING DOES NOT SUPPORT THE CREATION OF A STATE UNIVERSAL SERVICE FUND.

A review of the carriers' most recent filings uncovers a great amount of uncertainty surrounding the costing methodology of each model. For instance, 76.41% of BellSouth's 195 wire centers in Tennessee are deemed to be "high cost" based upon the revised cost results determined by BellSouth's Benchmark Cost Proxy Model ("BCPM"). In contrast, the results of the Hatfield Associates Model ("HAI Model"), sponsored jointly by AT&T and MCI, calculated a little more than half of BellSouth's wire centers as "high cost" (56.41%). Not surprisingly, the differences in assessed need are exaggerated. To wit, the monthly-estimated funding requirements of BellSouth's "high cost" wire centers total \$7.9 Million as determined by the BCPM, whereas the HAI Model determined funding at only \$4.4 Million. Furthermore, the output differential of each model is even more striking when one analyzes the costs developed for each wire center in the aggregate. More specifically, the monthly universal service support requirements generated by BellSouth per the BCPM fall to \$4.3 Million, whereas the HAI Model generated a surplus of \$12.5 Million. A more complete analysis of BellSouth's and United's universal service support requirements based upon the revised cost studies can be found in the exhibits submitted with these comments.

It is clear from these analyses that the substantial differences in perceived need do not provide the Authority with reliable data upon which it can determine the appropriate size of the universal service fund. Moreover, the extreme difference in cost results strongly suggests

that the TRA will require more information and analysis before determining whether a universal service fund is necessary, and if so, what size the fund should be.

The Authority has established a detailed record over a period of months in an effort to craft a reasonable and equitable universal service policy. The Authority's deliberate approach is well-advised, and it will benefit from the federal government's on-going work on these issues. Similar to the TRA, the Federal Communication Commission ("FCC") has recognized that the inadequate nature of the record inhibits it from making final determinations about appropriate costing methodology and outstanding implementation issues. Accordingly, the FCC has committed to resolving remaining implementation issues, while concurrently seeking to verify the operation of the cost model, including the input data elements.

The FCC anticipates the release of an order in a matter of weeks on its Inputs FNPRM (i.e., the Further Notice of Proposed Rulemaking, CC Docket Nos. 96-45, 97-160, and FCC 99-120 released May 28, 1999). The Inputs FMPRM examines many of the model input and operational issues that the TRA must confront prior to rendering its decision on the appropriate forward-looking economic cost model. Once determined, the TRA can use this model to calculate the required size, if any, of the state's universal service fund.

II. PHASE II OF THIS PROCEEDING MUST BE COMPLETED BEFORE THE TRA WILL BE CAPABLE OF REASONABLY DETERMINING THE SIZE OF THE STATE UNIVERSAL SERVICE FUND.

The TCTA suggests that the Authority conduct a focused proceeding after the FCC has released its order on the cost proxy model that will be used to determine federal universal

service support requirements beginning January 1, 2000. One would expect that the findings and conclusions of the FCC will be instructional in the TRA's examination of the more complex areas of the cost proxy models. Before Phase II is considered complete, the TRA must resolve those issues discussed in the Interim Order, but upon which a decision has been deferred (e.g., the customer location methodology, the outside plant network design, the determination of the appropriate distribution and feeder fill factors, and the optimal switching mix and capacity). It is advised that the Authority should require the carriers to submit revised studies based upon the most recent versions of their respective cost proxy models, in the likely event that enhancements have made to the model logic or input value data has become stale since initial filings.

III. RE-EXAMINATION OF THE CONCEPT OF "HIGH COST" RELATIVE TO THE REVENUE BENCHMARK MAY BE APPROPRIATE.

The revised cost studies submitted by the carriers should renew the Authority's interest in the appropriate definition of a high cost area. Based upon the filings of BellSouth and United, the majority of the companies' wire centers are deemed to be "high cost" (76% and 60%, respectively) according to the Authority's current formula of designating an area as high cost. Such a skewed bias towards "high cost" and high subsidies begs the question of whether the correct definition of high cost is being applied to size the state universal service fund.

The TCTA submits that merely because the costs of serving an area exceed either the rates charged for services or the average revenues received from subscribers in the area, the conclusion that the area is "high cost" does not necessarily follow. The determination of a

"high cost" area by means of a revenue benchmark can spawn further, and most likely, unwanted challenges for the TRA. As a principal determinant of high cost support, the revenue benchmark will require periodic adjustments for changes in the ILECs' average revenue by wire center. In addition, the use of a revenue benchmark to determine a carrier's level of required universal service support can restrict the Authority's ability to adjust the size of the fund in response to competitive developments (or the lack thereof).

The Authority should examine the merits of establishing a universal support system that is based upon a comparison of a serving area's estimated costs relative to the carrier's study area rather than comparing a serving area's costs to its average revenues. The TCTA recognizes that this recommendation may justify the Authority's reconsideration of its Order in Phase I to explore other options that have been considered by the FCC and other state regulatory authorities in recent months.

IV. CONCLUSION

The telecommunication industry has experienced significant change in the past two years. The record in this proceeding requires supplementation, and both the model platform and model inputs require further evaluation before the TRA can determine the size of the universal service fund in Tennessee - or if a fund is required at all. The Authority should examine the FCC's work and orders before adopting a schedule to move forward in this proceeding.

Respectfully submitted,

FARRIS, MATHEWS, BRANAN
& HELLEN, P.L.C.

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Comments of the Tennessee Cable Telecommunications Association have been served upon all parties of record by placing a copy of same in the United States Mail, properly addressed and postage prepaid, this the 18th day of October, 1999.

Charles B. Welch Jr.
Charles B. Welch, Jr.

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Docket No. 97-0888

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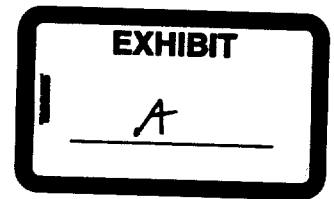
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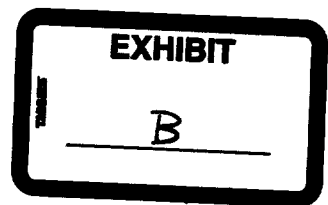
Tennessee Regulatory Authority
Docket No.97-00888 (Phase II)
Universal Service Proceeding



Summary of Revised Cost Study Results

<u>Description</u>	<u>Per Company</u>		<u>Per AT&T</u>	
	<u>BellSouth</u>	<u>United</u>	<u>BellSouth</u>	<u>United</u>
Number of wire centers	195	25	195	25
"High cost" wire centers	149	15	110	13
% of "high cost" wire centers	76.41%	60.00%	56.41%	52.00%
"High cost" wire center support required	\$7,895,534.59	\$616,242.47	\$4,388,127.48	\$425,304.63
All centers support required	\$4,263,009.25	(\$54,688.66)	(\$12,463,675.08)	(\$817,275.07)

Tennessee Regulatory Authority
Docket No. 97-00888 (Phase II)
Universal Service Proceeding



BellSouth Telecommunications, Inc.
Revised Cost Study per TRA Interim Order (September 16, 1999)
Calculated Universal Service Support for "High Cost Wire Centers"
Based Upon TRA Ordered Revisions to the BCPM Version 3.1

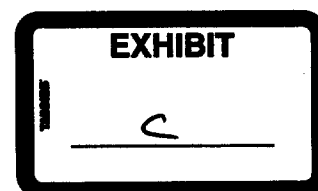
<u>Wire Center</u> <u>Number</u>	<u>Primary</u> <u>Residential Lines</u>	<u>Total</u> <u>Monthly Cost</u>	<u>Benchmark</u>	<u>Cost - Benchmark</u>	<u>Primary Lines x</u> <u>Rev. Shortfall</u>
1	1,287	\$80.02	\$34.83	\$45.19	\$58,159.53
2	2,189	45.48	32.67	12.81	28,041.09
3	4,367	43.62	35.05	8.57	37,425.19
4	9,808	41.14	30.83	10.31	101,120.48
5	2,009	79.61	28.98	50.63	101,715.67
6	3,357	62.90	31.87	31.03	104,167.71
7	1,526	45.48	36.93	8.55	13,047.30
8	797	86.56	27.58	58.98	47,007.06
9	4,652	50.44	36.23	14.21	66,104.92
10	3,616	47.22	31.04	16.18	58,506.88
11	1,512	77.65	35.43	42.22	63,836.64
12	5,714	49.32	39.53	9.79	55,940.06
13	2,443	52.11	33.61	18.50	45,195.50
14	26,553	29.63	31.33	(1.70)	
15	20,252	31.93	31.11	0.82	16,606.64
16	7,571	34.81	29.27	5.54	41,943.34
17	11,542	33.90	28.90	5.00	57,710.00
18	9,661	26.99	36.32	(9.33)	
19	17,033	31.98	29.75	2.23	37,983.59
20	4,233	54.40	29.23	25.17	106,544.61
21	5,265	39.41	29.85	9.56	50,333.40
22	5,481	37.96	27.65	10.31	56,509.11
23	3,317	57.25	32.03	25.22	83,654.74
24	4,099	61.22	29.42	31.80	130,348.20
25	31,075	34.91	31.79	3.12	96,954.00
26	17,407	35.41	35.58	(0.17)	
27	8,115	36.66	31.01	5.65	45,849.75
28	34,540	33.04	33.50	(0.46)	
29	567	107.90	38.10	69.80	39,576.60
30	5,256	48.48	31.27	17.21	90,455.76
31	2,238	59.56	31.28	28.28	63,290.64
32	3,832	64.52	35.89	28.63	109,710.16
33	2,033	69.78	25.46	44.32	90,102.56
34	2,303	45.62	36.56	9.06	20,865.18
35	2,855	42.46	35.29	7.17	20,470.35
36	13,787	29.60	32.69	(3.09)	
37	864	72.62	34.99	37.63	32,512.32
38	8,288	41.13	34.23	6.90	57,187.20
39	3,409	53.67	33.62	20.05	68,350.45
40	9,011	39.19	35.04	4.15	37,395.65
41	5,545	38.82	34.47	4.35	24,120.75
42	4,203	59.24	33.74	25.50	107,176.50
43	11,034	35.02	34.65	0.37	4,082.58

44	1,479	45.06	30.71	14.35	21,223.65
45	6,821	40.56	30.95	9.61	65,549.81
46	1,369	57.90	35.27	22.63	30,980.47
47	4,133	47.13	30.27	16.86	69,682.38
48	1,698	41.23	31.59	9.64	16,368.72
49	1,824	24.29	43.97	(19.68)	
50	22,837	32.25	34.71	(2.46)	
51	1,840	62.73	28.20	34.53	63,535.20
52	1,668	52.36	33.89	18.47	30,807.96
53	3,320	43.70	35.82	7.88	26,161.60
54	7,767	41.00	30.21	10.79	83,805.93
55	12,846	34.30	34.50	(0.20)	
56	864	57.26	35.10	22.16	19,146.24
57	<u>1,371</u>	65.47	38.61	26.86	<u>36,825.06</u>
page 1 total	394,483				2,734,089.13
58	8,659	\$31.62	\$32.20	(\$0.58)	
59	1,098	63.88	32.52	31.36	34,433.28
60	3,580	37.72	34.33	3.39	12,136.20
61	1,649	46.82	30.94	15.88	26,186.12
62	3,167	53.37	31.83	21.54	68,217.18
63	6,011	41.26	27.62	13.64	81,990.04
64	887	25.21	35.67	(10.46)	
65	18,363	31.42	35.63	(4.21)	
66	3,723	51.05	35.14	15.91	59,232.93
67	5,419	40.73	31.46	9.27	50,234.13
68	2,229	64.64	38.01	26.63	59,358.27
69	5,265	37.57	35.28	2.29	12,056.85
70	566	96.94	34.23	62.71	35,493.86
71	937	75.66	28.72	46.94	43,982.78
72	1,036	88.05	38.95	49.10	50,867.60
73	4,747	49.66	37.31	12.35	58,625.45
74	5,077	53.73	32.54	21.19	107,581.63
75	2,590	54.58	30.98	23.60	61,124.00
76	1,456	74.83	33.42	41.41	60,292.96
77	2,272	50.82	38.95	11.87	26,968.64
78	20,646	35.68	36.61	(0.93)	
79	11,758	28.92	38.42	(9.50)	
80	6,593	38.10	36.01	2.09	13,779.37
81	3,925	53.61	30.43	23.18	90,981.50
82	3,608	45.48	31.85	13.63	49,177.04
83	7,528	43.23	33.42	9.81	73,849.68
84	844	59.74	31.21	28.53	24,079.32
85	11,429	29.12	33.13	(4.01)	
86	21,738	31.98	29.58	2.40	52,171.20
87	34,430	30.69	31.79	(1.10)	
88	33,927	29.55	31.60	(2.05)	
89	19,538	36.21	29.57	6.64	129,732.32
90	17,265	41.00	35.60	5.40	93,231.00
91	11,592	40.37	32.98	7.39	85,664.88
92	3,351	36.72	30.31	6.41	21,479.91
93	8,989	37.12	34.59	2.53	22,742.17
94	5,934	36.10	33.17	2.93	17,386.62
95	8,377	43.52	33.68	9.84	82,429.68
96	6,276	45.98	36.16	9.82	61,630.32
97	8,272	47.39	34.98	12.41	102,655.52

98	1,524	55.93	37.79	18.14	27,645.36
99	3,955	51.10	38.96	12.14	48,013.70
100	745	97.34	37.09	60.25	44,886.25
101	35,297	34.30	31.46	2.84	100,243.48
102	3,542	42.61	33.00	9.61	34,038.62
103	2,029	57.43	34.39	23.04	46,748.16
104	2,134	65.93	32.56	33.37	71,211.58
105	5,438	44.46	33.76	10.70	58,186.60
106	1,264	59.51	33.24	26.27	33,205.28
107	4,330	35.92	34.49	1.43	6,191.90
108	52,478	28.49	34.06	(5.57)	
109	11,160	33.12	34.34	(1.22)	
110	29,311	30.38	31.77	(1.39)	
111	26,454	27.09	31.60	(4.51)	
112	18,392	31.47	34.13	(2.66)	
113	41,888	28.25	34.01	(5.76)	
114	<u>360</u>	69.80	34.41	35.39	<u>12,740.40</u>
page 2 total	565,052				2,252,883.78
115	11,620	27.47	36.27	(8.80)	
116	22,765	29.83	32.66	(2.83)	
117	39,467	28.73	37.45	(8.72)	
118	32,140	29.43	36.86	(7.43)	
119	15,575	31.85	35.01	(3.16)	
120	14,151	33.35	34.42	(1.07)	
121	7,866	42.2	33.33	8.87	69,771.42
122	3,111	44.28	33.67	10.61	33,007.71
123	40,155	32.02	37.66	(5.64)	
124	22,584	34.56	35.98	(1.42)	
125	10,097	41.17	30.1	11.07	111,773.79
126	977	86.39	34.59	51.80	50,608.60
127	5,195	47.26	33.22	14.04	72,937.80
128	3,094	45.95	30.52	15.43	47,740.42
129	0	24.74	37.03	(12.29)	
130	17,646	28.96	37.03	(8.07)	
131	2,054	31.1	29.67	1.43	2,937.22
132	12,997	29.58	32.25	(2.67)	
133	14,296	31.58	36.36	(4.78)	
134	82	29.52	105.8	(76.28)	
135	36,429	29.29	31.26	(1.97)	
136	24,793	28.85	33.07	(4.22)	
137	5,366	28.54	39.78	(11.24)	
138	24,765	30.78	33.03	(2.25)	
139	16,094	29.73	32.33	(2.60)	
140	13,851	26.14	44.85	(18.71)	
141	29,406	28.81	31.75	(2.94)	
142	6,693	26.19	43.21	(17.02)	
143	7,099	36.87	33.11	3.76	26,692.24
144	15,475	31.32	30.94	0.38	5,880.50
145	2,119	45.07	32.61	12.46	26,402.74
146	10,548	43.58	34.32	9.26	97,674.48
147	12,625	31.96	30.61	1.35	17,043.75
148	4,810	28.74	30.52	(1.78)	
149	4,702	34.24	30.96	3.28	15,422.56
150	9,568	38.43	30.19	8.24	78,840.32
151	543	82.95	31.97	50.98	27,682.14

152	8,662	51.25	33.02	18.23	157,908.26
153	3,894	45.04	36.15	8.89	34,617.66
154	720	95.6	30.64	64.96	46,771.20
155	5,534	41.16	34.56	6.60	36,524.40
156	888	79.74	35.27	44.47	39,489.36
157	4,702	43.84	30.45	13.39	62,959.78
158	5,585	38.81	37.85	0.96	5,361.60
159	7,677	42.24	29.86	12.38	95,041.26
160	3,429	35.77	31.65	4.12	14,127.48
161	6,554	42.45	29.48	12.97	85,005.38
162	1,177	58.48	31.45	27.03	31,814.31
163	8,591	41.14	34.73	6.41	55,068.31
164	4,394	53.73	31.67	22.06	96,931.64
165	1,502	57.49	34.48	23.01	34,561.02
166	13,952	30.39	35.76	(5.37)	
167	858	75.84	34.94	40.90	35,092.20
168	2,429	74.15	32.56	41.59	101,022.11
169	5,884	49.65	34.8	14.85	87,377.40
170	2,678	43.64	32.71	10.93	29,270.54
171	<u>3,856</u>	49.39	30.29	19.10	<u>73,649.60</u>
page 3 total	593,724				1,807,009.20
172	8,515	37.42	35.69	1.73	14,730.95
173	2,334	45.08	40.19	4.89	11,413.26
174	2,034	62.04	30.38	31.66	64,396.44
175	6,735	48.77	29.3	19.47	131,130.45
176	19,876	38.31	32.7	5.61	111,504.36
177	5,086	41.47	34.4	7.07	35,958.02
178	9,081	35.35	36.2	(0.85)	
179	1,305	48.25	37.02	11.23	14,655.15
180	992	83.48	34.59	48.89	48,498.88
181	2,271	56.26	31.48	24.78	56,275.38
182	3,102	40.07	32.34	7.73	23,978.46
183	1,543	65.75	26.07	39.68	61,226.24
184	6,256	36.35	33.15	3.20	20,019.20
185	1,098	68.88	33.49	35.39	38,858.22
186	4,511	44.06	33.07	10.99	49,575.89
187	4,637	34.34	33.9	0.44	2,040.28
188	2,514	39.68	35.87	3.81	9,578.34
189	1,369	52.06	40.59	11.47	15,702.43
190	2,853	58.85	30.86	27.99	79,855.47
191	631	94.58	35.22	59.36	37,456.16
192	9,347	42.8	33.99	8.81	82,347.07
193	1,691	67.83	34.62	33.21	56,158.11
194	1,385	68.5	34.38	34.12	47,256.20
195	<u>3,804</u>	57.72	34.34	23.38	<u>88,937.52</u>
page 4 total	102,970				1,101,552.48
All centers	1,656,229				\$7,895,534.59

**Tennessee Regulatory Authority
Docket No. 97-00888 (Phase II)
Universal Service Proceeding**



**BellSouth Telecommunications, Inc.
Revised Cost Study per TRA Interim Order (September 16, 1999)
Calculated Net Universal Service Support for All Wire Centers
Based Upon TRA Ordered Revisions to the BCPM Version 3.1**

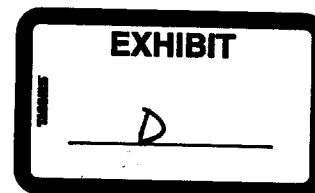
<u>Wire Center</u>	<u>Primary</u>	<u>Total</u>			<u>Primary Lines x</u>
<u>Number</u>	<u>Residential Lines</u>	<u>Monthly Cost</u>	<u>Benchmark</u>	<u>Cost - Benchmark</u>	<u>Rev. Shortfall</u>
1	1,287	\$80.02	\$34.83	\$45.19	\$58,159.53
2	2,189	45.48	32.67	12.81	28,041.09
3	4,367	43.62	35.05	8.57	37,425.19
4	9,808	41.14	30.83	10.31	101,120.48
5	2,009	79.61	28.98	50.63	101,715.67
6	3,357	62.90	31.87	31.03	104,167.71
7	1,526	45.48	36.93	8.55	13,047.30
8	797	86.56	27.58	58.98	47,007.06
9	4,652	50.44	36.23	14.21	66,104.92
10	3,616	47.22	31.04	16.18	58,506.88
11	1,512	77.65	35.43	42.22	63,836.64
12	5,714	49.32	39.53	9.79	55,940.06
13	2,443	52.11	33.61	18.50	45,195.50
14	26,553	29.63	31.33	(1.70)	(45,140.10)
15	20,252	31.93	31.11	0.82	16,606.64
16	7,571	34.81	29.27	5.54	41,943.34
17	11,542	33.90	28.90	5.00	57,710.00
18	9,661	26.99	36.32	(9.33)	(90,137.13)
19	17,033	31.98	29.75	2.23	37,983.59
20	4,233	54.40	29.23	25.17	106,544.61
21	5,265	39.41	29.85	9.56	50,333.40
22	5,481	37.96	27.65	10.31	56,509.11
23	3,317	57.25	32.03	25.22	83,654.74
24	4,099	61.22	29.42	31.80	130,348.20
25	31,075	34.91	31.79	3.12	96,954.00
26	17,407	35.41	35.58	(0.17)	(2,959.19)
27	8,115	36.66	31.01	5.65	45,849.75
28	34,540	33.04	33.50	(0.46)	(15,888.40)
29	567	107.90	38.10	69.80	39,576.60
30	5,256	48.48	31.27	17.21	90,455.76
31	2,238	59.56	31.28	28.28	63,290.64
32	3,832	64.52	35.89	28.63	109,710.16
33	2,033	69.78	25.46	44.32	90,102.56
34	2,303	45.62	36.56	9.06	20,865.18
35	2,855	42.46	35.29	7.17	20,470.35
36	13,787	29.60	32.69	(3.09)	(42,601.83)
37	864	72.62	34.99	37.63	32,512.32
38	8,288	41.13	34.23	6.90	57,187.20
39	3,409	53.67	33.62	20.05	68,350.45
40	9,011	39.19	35.04	4.15	37,395.65
41	5,545	38.82	34.47	4.35	24,120.75
42	4,203	59.24	33.74	25.50	107,176.50
43	11,034	35.02	34.65	0.37	4,082.58

44	1,479	45.06	30.71	14.35	21,223.65
45	6,821	40.56	30.95	9.61	65,549.81
46	1,369	57.90	35.27	22.63	30,980.47
47	4,133	47.13	30.27	16.86	69,682.38
48	1,698	41.23	31.59	9.64	16,368.72
49	1,824	24.29	43.97	(19.68)	(35,896.32)
50	22,837	32.25	34.71	(2.46)	(56,179.02)
51	1,840	62.73	28.20	34.53	63,535.20
52	1,668	52.36	33.89	18.47	30,807.96
53	3,320	43.70	35.82	7.88	26,161.60
54	7,767	41.00	30.21	10.79	83,805.93
55	12,846	34.30	34.50	(0.20)	(2,569.20)
56	864	57.26	35.10	22.16	19,146.24
57	<u>1,371</u>	65.47	38.61	26.86	<u>36,825.06</u>
page 1 total	394,483				2,442,717.94
58	8,659	\$31.62	\$32.20	(\$0.58)	(5,022.22)
59	1,098	63.88	32.52	31.36	34,433.28
60	3,580	37.72	34.33	3.39	12,136.20
61	1,649	46.82	30.94	15.88	26,186.12
62	3,167	53.37	31.83	21.54	68,217.18
63	6,011	41.26	27.62	13.64	81,990.04
64	887	25.21	35.67	(10.46)	(9,278.02)
65	18,363	31.42	35.63	(4.21)	(77,308.23)
66	3,723	51.05	35.14	15.91	59,232.93
67	5,419	40.73	31.46	9.27	50,234.13
68	2,229	64.64	38.01	26.63	59,358.27
69	5,265	37.57	35.28	2.29	12,056.85
70	566	96.94	34.23	62.71	35,493.86
71	937	75.66	28.72	46.94	43,982.78
72	1,036	88.05	38.95	49.10	50,867.60
73	4,747	49.66	37.31	12.35	58,625.45
74	5,077	53.73	32.54	21.19	107,581.63
75	2,590	54.58	30.98	23.60	61,124.00
76	1,456	74.83	33.42	41.41	60,292.96
77	2,272	50.82	38.95	11.87	26,968.64
78	20,646	35.68	36.61	(0.93)	(19,200.78)
79	11,758	28.92	38.42	(9.50)	(111,701.00)
80	6,593	38.10	36.01	2.09	13,779.37
81	3,925	53.61	30.43	23.18	90,981.50
82	3,608	45.48	31.85	13.63	49,177.04
83	7,528	43.23	33.42	9.81	73,849.68
84	844	59.74	31.21	28.53	24,079.32
85	11,429	29.12	33.13	(4.01)	(45,830.29)
86	21,738	31.98	29.58	2.40	52,171.20
87	34,430	30.69	31.79	(1.10)	(37,873.00)
88	33,927	29.55	31.60	(2.05)	(69,550.35)
89	19,538	36.21	29.57	6.64	129,732.32
90	17,265	41.00	35.60	5.40	93,231.00
91	11,592	40.37	32.98	7.39	85,664.88
92	3,351	36.72	30.31	6.41	21,479.91
93	8,989	37.12	34.59	2.53	22,742.17
94	5,934	36.10	33.17	2.93	17,386.62
95	8,377	43.52	33.68	9.84	82,429.68
96	6,276	45.98	36.16	9.82	61,630.32
97	8,272	47.39	34.98	12.41	102,655.52

98	1,524	55.93	37.79	18.14	27,645.36
99	3,955	51.10	38.96	12.14	48,013.70
100	745	97.34	37.09	60.25	44,886.25
101	35,297	34.30	31.46	2.84	100,243.48
102	3,542	42.61	33.00	9.61	34,038.62
103	2,029	57.43	34.39	23.04	46,748.16
104	2,134	65.93	32.56	33.37	71,211.58
105	5,438	44.46	33.76	10.70	58,186.60
106	1,264	59.51	33.24	26.27	33,205.28
107	4,330	35.92	34.49	1.43	6,191.90
108	52,478	28.49	34.06	(5.57)	(292,302.46)
109	11,160	33.12	34.34	(1.22)	(13,615.20)
110	29,311	30.38	31.77	(1.39)	(40,742.29)
111	26,454	27.09	31.60	(4.51)	(119,307.54)
112	18,392	31.47	34.13	(2.66)	(48,922.72)
113	41,888	28.25	34.01	(5.76)	(241,274.88)
114	<u>360</u>	69.80	34.41	35.39	<u>12,740.40</u>
page 2 total	565,052				1,120,954.80
115	11,620	27.47	36.27	(8.80)	(102,256.00)
116	22,765	29.83	32.66	(2.83)	(64,424.95)
117	39,467	28.73	37.45	(8.72)	(344,152.24)
118	32,140	29.43	36.86	(7.43)	(238,800.20)
119	15,575	31.85	35.01	(3.16)	(49,217.00)
120	14,151	33.35	34.42	(1.07)	(15,141.57)
121	7,866	42.2	33.33	8.87	69,771.42
122	3,111	44.28	33.67	10.61	33,007.71
123	40,155	32.02	37.66	(5.64)	(226,474.20)
124	22,584	34.56	35.98	(1.42)	(32,069.28)
125	10,097	41.17	30.1	11.07	111,773.79
126	977	86.39	34.59	51.80	50,608.60
127	5,195	47.26	33.22	14.04	72,937.80
128	3,094	45.95	30.52	15.43	47,740.42
129	0	24.74	37.03	(12.29)	0.00
130	17,646	28.96	37.03	(8.07)	(142,403.22)
131	2,054	31.1	29.67	1.43	2,937.22
132	12,997	29.58	32.25	(2.67)	(34,701.99)
133	14,296	31.58	36.36	(4.78)	(68,334.88)
134	82	29.52	105.8	(76.28)	(6,254.96)
135	36,429	29.29	31.26	(1.97)	(71,765.13)
136	24,793	28.85	33.07	(4.22)	(104,626.46)
137	5,366	28.54	39.78	(11.24)	(60,313.84)
138	24,765	30.78	33.03	(2.25)	(55,721.25)
139	16,094	29.73	32.33	(2.60)	(41,844.40)
140	13,851	26.14	44.85	(18.71)	(259,152.21)
141	29,406	28.81	31.75	(2.94)	(86,453.64)
142	6,693	26.19	43.21	(17.02)	(113,914.86)
143	7,099	36.87	33.11	3.76	26,692.24
144	15,475	31.32	30.94	0.38	5,880.50
145	2,119	45.07	32.61	12.46	26,402.74
146	10,548	43.58	34.32	9.26	97,674.48
147	12,625	31.96	30.61	1.35	17,043.75
148	4,810	28.74	30.52	(1.78)	(8,561.80)
149	4,702	34.24	30.96	3.28	15,422.56
150	9,568	38.43	30.19	8.24	78,840.32
151	543	82.95	31.97	50.98	27,682.14

152	8,662	51.25	33.02	18.23	157,908.26
153	3,894	45.04	36.15	8.89	34,617.66
154	720	95.6	30.64	64.96	46,771.20
155	5,534	41.16	34.56	6.60	36,524.40
156	888	79.74	35.27	44.47	39,489.36
157	4,702	43.84	30.45	13.39	62,959.78
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160	3,429	35.77	31.65	4.12	14,127.48
161	6,554	42.45	29.48	12.97	85,005.38
162	1,177	58.48	31.45	27.03	31,814.31
163	8,591	41.14	34.73	6.41	55,068.31
164	4,394	53.73	31.67	22.06	96,931.64
165	1,502	57.49	34.48	23.01	34,561.02
166	13,952	30.39	35.76	(5.37)	(74,922.24)
167	858	75.84	34.94	40.90	35,092.20
168	2,429	74.15	32.56	41.59	101,022.11
169	5,884	49.65	34.8	14.85	87,377.40
170	2,678	43.64	32.71	10.93	29,270.54
171	<u>3,856</u>	49.39	30.29	19.10	<u>73,649.60</u>
page 3 total	593,724				(394,497.12)
172	8,515	37.42	35.69	1.73	14,730.95
173	2,334	45.08	40.19	4.89	11,413.26
174	2,034	62.04	30.38	31.66	64,396.44
175	6,735	48.77	29.3	19.47	131,130.45
176	19,876	38.31	32.7	5.61	111,504.36
177	5,086	41.47	34.4	7.07	35,958.02
178	9,081	35.35	36.2	(0.85)	(7,718.85)
179	1,305	48.25	37.02	11.23	14,655.15
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184	6,256	36.35	33.15	3.20	20,019.20
185	1,098	68.88	33.49	35.39	38,858.22
186	4,511	44.06	33.07	10.99	49,575.89
187	4,637	34.34	33.9	0.44	2,040.28
188	2,514	39.68	35.87	3.81	9,578.34
189	1,369	52.06	40.59	11.47	15,702.43
190	2,853	58.85	30.86	27.99	79,855.47
191	631	94.58	35.22	59.36	37,456.16
192	9,347	42.8	33.99	8.81	82,347.07
193	1,691	67.83	34.62	33.21	56,158.11
194	1,385	68.5	34.38	34.12	47,256.20
195	<u>3,804</u>	57.72	34.34	23.38	<u>88,937.52</u>
page 4 total	102,970				1,093,833.63
All centers	1,656,229				\$4,263,009.25

Tennessee Regulatory Authority
Docket No. 97-00888 (Phase II)
Universal Service Proceeding



United Telephone Company
Revised Cost Study per TRA Interim Order (September 16, 1999)
Calculated Universal Service Support for "High Cost Wire Centers"
Based Upon TRA Ordered Revisions to the BCPM Version 3.1

<u>Wire Center Number</u>	<u>Primary Residential Lines</u>	<u>Total Monthly Cost</u>	<u>Benchmark</u>	<u>Cost - Benchmark</u>	<u>Primary Lines x Rev. Shortfall</u>
1	6,101	\$32.70	\$30.41	\$2.29	\$13,971.29
2	1,961	42.10	29.67	12.43	24,375.23
3	11,115	25.58	31.21	(5.63)	
4	3,746	36.59	31.21	5.38	20,153.48
5	1,501	71.38	24.38	47.00	70,547.00
6	7,565	28.16	31.50	(3.34)	
7	6,466	31.58	32.59	(1.01)	
8	11,436	24.66	29.60	(4.94)	
9	6,973	35.89	28.61	7.28	50,763.44
10	2,032	50.15	26.76	23.39	47,528.48
11	16,019	32.41	28.58	3.83	61,352.77
12	2,231	47.80	26.23	21.57	48,122.67
13	20,253	23.89	33.71	(9.82)	
14	7,202	20.66	33.71	(13.05)	
15	8,084	31.84	29.50	2.34	18,916.56
16	19,240	23.00	29.76	(6.76)	
17	6,812	24.20	29.76	(5.56)	
18	4,600	43.20	26.18	17.02	78,292.00
19	5,120	25.55	29.76	(4.21)	
20	4,620	25.55	33.71	(8.16)	
21	2,332	51.50	27.06	24.44	56,994.08
22	4,740	40.45	28.12	12.33	58,444.20
23	1,536	49.96	26.62	23.34	35,850.24
24	3,117	31.84	30.57	1.27	3,958.59
25	<u>2,078</u>	39.80	26.82	12.98	<u>26,972.44</u>
All centers	166,880				\$616,242.47

**Tennessee Regulatory Authority
Docket No. 97-00888 (Phase II)
Universal Service Proceeding**



**United Telephone Company
Revised Cost Study per TRA Interim Order (September 16, 1999)
Calculated Net Universal Service Support for All Wire Centers
Based Upon TRA Ordered Revisions to the BCPM Version 3.1**

<u>Wire Center</u> <u>Number</u>	<u>Primary</u> <u>Residential Lines</u>	<u>Total</u> <u>Monthly Cost</u>	<u>Benchmark</u>	<u>Cost - Benchmark</u>	<u>Primary Lines x</u> <u>Rev. Shortfall</u>
1	6,101	\$32.70	\$30.41	\$2.29	\$13,971.29
2	1,961	42.10	29.67	12.43	24,375.23
3	11,115	25.58	31.21	(5.63)	(62,577.45)
4	3,746	36.59	31.21	5.38	20,153.48
5	1,501	71.38	24.38	47.00	70,547.00
6	7,565	28.16	31.50	(3.34)	(25,267.10)
7	6,466	31.58	32.59	(1.01)	(6,530.66)
8	11,436	24.66	29.60	(4.94)	(56,493.84)
9	6,973	35.89	28.61	7.28	50,763.44
10	2,032	50.15	26.76	23.39	47,528.48
11	16,019	32.41	28.58	3.83	61,352.77
12	2,231	47.80	26.23	21.57	48,122.67
13	20,253	23.89	33.71	(9.82)	(198,884.46)
14	7,202	20.66	33.71	(13.05)	(93,986.10)
15	8,084	31.84	29.50	2.34	18,916.56
16	19,240	23.00	29.76	(6.76)	(130,062.40)
17	6,812	24.20	29.76	(5.56)	(37,874.72)
18	4,600	43.20	26.18	17.02	78,292.00
19	5,120	25.55	29.76	(4.21)	(21,555.20)
20	4,620	25.55	33.71	(8.16)	(37,699.20)
21	2,332	51.50	27.06	24.44	56,994.08
22	4,740	40.45	28.12	12.33	58,444.20
23	1,536	49.96	26.62	23.34	35,850.24
24	3,117	31.84	30.57	1.27	3,958.59
25	<u>2,078</u>	39.80	26.82	12.98	<u>26,972.44</u>
All centers	166,880				(\$54,688.66)

Tennessee Regulatory Authority
Docket No. 97-00888 (Phase II)
Universal Service Proceeding

EXHIBIT

F

BellSouth Telecommunications, Inc. per AT&T Cost Study
Revised Cost Study per TRA Interim Order (September 16, 1999)
Calculated Universal Service Support for "High Cost Wire Centers"
Based Upon TRA Ordered Revisions to the Hatfield Associates Model Version 5.0

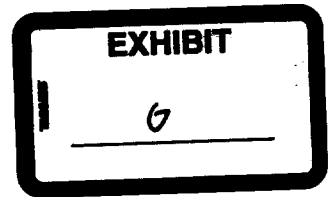
<u>Wire Center</u> <u>Number</u>	<u>Primary</u> <u>Residential Lines</u>	<u>Total</u> <u>Monthly Cost</u>	<u>Benchmark</u>	<u>Cost - Benchmark</u>	<u>Primary Lines x</u> <u>Rev. Shortfall</u>
1	1,287	\$70.68	\$34.83	\$35.85	\$46,138.95
2	2,189	44.55	32.67	11.88	26,005.32
3	4,367	35.61	35.05	0.56	2,445.52
4	9,808	31.14	30.83	0.31	3,040.48
5	2,009	69.62	28.98	40.64	81,645.76
6	3,357	59.40	31.87	27.53	92,418.21
7	1,526	53.95	36.93	17.02	25,972.52
8	797	72.11	27.58	44.53	35,490.41
9	4,652	44.46	36.23	8.23	38,285.96
10	3,616	48.92	31.04	17.88	64,654.08
11	1,512	72.05	35.43	36.62	55,369.44
12	5,714	41.09	39.53	1.56	8,913.84
13	2,443	48.20	33.61	14.59	35,643.37
14	26,553	18.28	31.33	(13.05)	
15	20,252	16.41	31.11	(14.70)	
16	7,571	27.49	29.27	(1.78)	
17	11,542	21.44	28.90	(7.46)	
18	9,661	15.87	36.32	(20.45)	
19	17,033	17.39	29.75	(12.36)	
20	4,233	19.58	29.23	(9.65)	
21	5,265	25.35	29.85	(4.50)	
22	5,481	23.68	27.65	(3.97)	
23	3,317	51.83	32.03	19.80	65,676.60
24	4,099	54.37	29.42	24.95	102,270.05
25	31,075	24.39	31.79	(7.40)	
26	17,407	24.16	35.58	(11.42)	
27	8,115	27.71	31.01	(3.30)	
28	34,540	22.93	33.50	(10.57)	
29	567	113.80	38.10	75.70	42,921.90
30	5,256	46.17	31.27	14.90	78,314.40
31	2,238	57.29	31.28	26.01	58,210.38
32	3,832	63.00	35.89	27.11	103,885.52
33	2,033	41.53	25.46	16.07	32,670.31
34	2,303	43.45	36.56	6.89	15,867.67
35	2,855	31.13	35.29	(4.16)	
36	13,787	22.39	32.69	(10.30)	
37	864	67.43	34.99	32.44	28,028.16
38	8,288	35.33	34.23	1.10	9,116.80
39	3,409	53.21	33.62	19.59	66,782.31
40	9,011	31.78	35.04	(3.26)	
41	5,545	33.36	34.47	(1.11)	

42	4,203	54.96	33.74	21.22	89,187.66
43	11,034	25.02	34.65	(9.63)	
44	1,479	43.91	30.71	13.20	19,522.80
45	6,821	32.79	30.95	1.84	12,550.64
46	1,369	48.21	35.27	12.94	17,714.86
47	4,133	36.06	30.27	5.79	23,930.07
48	1,698	32.41	31.59	0.82	1,392.36
49	1,824	12.54	43.97	(31.43)	
50	22,837	23.90	34.71	(10.81)	
51	1,840	56.02	28.20	27.82	51,188.80
52	1,668	45.88	33.89	11.99	19,999.32
53	3,320	37.72	35.82	1.90	6,308.00
54	7,767	31.57	30.21	1.36	10,563.12
55	12,846	23.71	34.50	(10.79)	
56	864	54.56	35.10	19.46	16,813.44
57	<u>1,371</u>	62.00	38.61	23.39	<u>32,067.69</u>
page 1 total	394,483				1,421,006.72
58	8,659	23.09	\$32.20	(9.11)	
59	1,098	61.18	32.52	28.66	31,468.68
60	3,580	34.86	34.33	0.53	1,897.40
61	1,649	42.13	30.94	11.19	18,452.31
62	3,167	42.17	31.83	10.34	32,746.78
63	6,011	23.51	27.62	(4.11)	
64	887	19.28	35.67	(16.39)	
65	18,363	18.76	35.63	(16.87)	
66	3,723	37.13	35.14	1.99	7,408.77
67	5,419	33.25	31.46	1.79	9,700.01
68	2,229	58.97	38.01	20.96	46,719.84
69	5,265	27.11	35.28	(8.17)	
70	566	92.16	34.23	57.93	32,788.38
71	937	54.90	28.72	26.18	24,530.66
72	1,036	100.93	38.95	61.98	64,211.28
73	4,747	43.45	37.31	6.14	29,146.58
74	5,077	51.71	32.54	19.17	97,326.09
75	2,590	55.84	30.98	24.86	64,387.40
76	1,456	70.96	33.42	37.54	54,658.24
77	2,272	42.99	38.95	4.04	9,178.88
78	20,646	29.16	36.61	(7.45)	
79	11,758	19.08	38.42	(19.34)	
80	6,593	30.88	36.01	(5.13)	
81	3,925	45.24	30.43	14.81	58,129.25
82	3,608	43.50	31.85	11.65	42,033.20
83	7,528	34.18	33.42	0.76	5,721.28
84	844	52.95	31.21	21.74	18,348.56
85	11,429	17.39	33.13	(15.74)	
86	21,738	19.28	29.58	(10.30)	
87	34,430	17.67	31.79	(14.12)	
88	33,927	18.00	31.60	(13.60)	
89	19,538	22.79	29.57	(6.78)	
90	17,265	30.07	35.60	(5.53)	
91	11,592	29.93	32.98	(3.05)	
92	3,351	31.37	30.31	1.06	3,552.06
93	8,989	26.53	34.59	(8.06)	
94	5,934	30.54	33.17	(2.63)	
95	8,377	36.21	33.68	2.53	21,193.81

96	6,276	30.72	36.16	(5.44)	
97	8,272	41.15	34.98	6.17	51,038.24
98	1,524	62.97	37.79	25.18	38,374.32
99	3,955	47.72	38.96	8.76	34,645.80
100	745	78.72	37.09	41.63	31,014.35
101	35,297	23.73	31.46	(7.73)	
102	3,542	36.89	33.00	3.89	13,778.38
103	2,029	52.14	34.39	17.75	36,014.75
104	2,134	61.78	32.56	29.22	62,355.48
105	5,438	34.80	33.76	1.04	5,655.52
106	1,264	56.05	33.24	22.81	28,831.84
107	4,330	25.87	34.49	(8.62)	
108	52,478	17.16	34.06	(16.90)	
109	11,160	14.93	34.34	(19.41)	
110	29,311	15.42	31.77	(16.35)	
111	26,454	15.76	31.60	(15.84)	
112	18,392	18.18	34.13	(15.95)	
113	41,888	16.24	34.01	(17.77)	
114	<u>360</u>	15.76	34.41	(18.65)	
page 2 total	565,052				975,308.14
115	11,620	79.90	36.27	43.63	506,980.60
116	22,765	13.72	32.66	(18.94)	
117	39,467	16.03	37.45	(21.42)	
118	32,140	16.39	36.86	(20.47)	
119	15,575	15.56	35.01	(19.45)	
120	14,151	21.33	34.42	(13.09)	
121	7,866	36.62	33.33	3.29	25,879.14
122	3,111	34.76	33.67	1.09	3,390.99
123	40,155	22.14	37.66	(15.52)	
124	22,584	22.99	35.98	(12.99)	
125	10,097	35.14	30.1	5.04	50,888.88
126	977	78.55	34.59	43.96	42,948.92
127	5,195	42.33	33.22	9.11	47,326.45
128	3,094	40.85	30.52	10.33	31,961.02
129	0	0	37.03	(37.03)	
130	17,646	15.98	37.03	(21.05)	
131	2,054	19.14	29.67	(10.53)	
132	12,997	19.04	32.25	(13.21)	
133	14,296	18.10	36.36	(18.26)	
134	82	64.83	105.80	(40.97)	
135	36,429	15.50	31.26	(15.76)	
136	24,793	16.84	33.07	(16.23)	
137	5,366	15.17	39.78	(24.61)	
138	24,765	16.08	33.03	(16.95)	
139	16,094	16.24	32.33	(16.09)	
140	13,851	17.57	44.85	(27.28)	
141	29,406	14.94	31.75	(16.81)	
142	6,693	16.43	43.21	(26.78)	
143	7,099	29.60	33.11	(3.51)	
144	15,475	18.51	30.94	(12.43)	
145	2,119	40.31	32.61	7.70	16,316.30
146	10,548	33.92	34.32	(0.40)	
147	12,625	18.92	30.61	(11.69)	
148	4,810	20.03	30.52	(10.49)	
149	4,702	27.70	30.96	(3.26)	

150	9,568	30.74	30.19	0.55	5,262.40
151	543	76.49	31.97	44.52	24,174.36
152	8,662	41.95	33.02	8.93	77,351.66
153	3,894	40.98	36.15	4.83	18,808.02
154	720	83.28	30.64	52.64	37,900.80
155	5,534	33.62	34.56	(0.94)	
156	888	73.79	35.27	38.52	34,205.76
157	4,702	32.13	30.45	1.68	7,899.36
158	5,585	32.91	37.85	(4.94)	
159	7,677	36.18	29.86	6.32	48,518.64
160	3,429	32.94	31.65	1.29	4,423.41
161	6,554	32.84	29.48	3.36	22,021.44
162	1,177	56.38	31.45	24.93	29,342.61
163	8,591	27.79	34.73	(6.94)	
164	4,394	51.03	31.67	19.36	85,067.84
165	1,502	56.20	34.48	21.72	32,623.44
166	13,952	20.24	35.76	(15.52)	
167	858	62.94	34.94	28.00	24,024.00
168	2,429	65.83	32.56	33.27	80,812.83
169	5,884	47.26	34.80	12.46	73,314.64
170	2,678	36.01	32.71	3.30	8,837.40
171	<u>3,856</u>	44.78	30.29	14.49	<u>55,873.44</u>
page 3 total	593,724				1,396,154.35
172	8,515	26.79	35.69	(8.90)	
173	2,334	46.20	40.19	6.01	14,027.34
174	2,034	53.58	30.38	23.20	47,188.80
175	6,735	42.26	29.30	12.96	87,285.60
176	19,876	28.32	32.70	(4.38)	
177	5,086	35.65	34.40	1.25	6,357.50
178	9,081	25.15	36.20	(11.05)	
179	1,305	46.98	37.02	9.96	12,997.80
180	992	63.49	34.59	28.90	28,668.80
181	2,271	50.77	31.48	19.29	43,807.59
182	3,102	31.25	32.34	(1.09)	
183	1,543	46.67	26.07	20.60	31,785.80
184	6,256	26.88	33.15	(6.27)	
185	1,098	63.49	33.49	30.00	32,940.00
186	4,511	38.98	33.07	5.91	26,660.01
187	4,637	30.46	33.90	(3.44)	
188	2,514	34.78	35.87	(1.09)	
189	1,369	56.13	40.59	15.54	21,274.26
190	2,853	45.90	30.86	15.04	42,909.12
191	631	79.99	35.22	44.77	28,249.87
192	9,347	35.21	33.99	1.22	11,403.34
193	1,691	64.81	34.62	30.19	51,051.29
194	1,385	54.89	34.38	20.51	28,406.35
195	<u>3,804</u>	55.54	34.34	21.20	<u>80,644.80</u>
page 4 total	102,970				595,658.27
All centers	1,656,229				\$4,388,127.48

**Tennessee Regulatory Authority
Docket No. 97-00888 (Phase II)
Universal Service Proceeding**



**BellSouth Telecommunications, Inc. per AT&T Cost Study
Revised Cost Study per TRA Interim Order (September 16, 1999)
Calculated Net Universal Service Support for All Wire Centers
Based Upon TRA Ordered Revisions to the Hatfield Associates Model Version 5.0**

<u>Wire Center</u> <u>Number</u>	<u>Primary</u> <u>Residential Lines</u>	<u>Total</u> <u>Monthly Cost</u>	<u>Benchmark</u>	<u>Cost - Benchmark</u>	<u>Primary Lines x</u> <u>Rev. Shortfall</u>
1	1,287	\$70.68	\$34.83	\$35.85	\$46,138.95
2	2,189	44.55	32.67	11.88	26,005.32
3	4,367	35.61	35.05	0.56	2,445.52
4	9,808	31.14	30.83	0.31	3,040.48
5	2,009	69.62	28.98	40.64	81,645.76
6	3,357	59.40	31.87	27.53	92,418.21
7	1,526	53.95	36.93	17.02	25,972.52
8	797	72.11	27.58	44.53	35,490.41
9	4,652	44.46	36.23	8.23	38,285.96
10	3,616	48.92	31.04	17.88	64,654.08
11	1,512	72.05	35.43	36.62	55,369.44
12	5,714	41.09	39.53	1.56	8,913.84
13	2,443	48.20	33.61	14.59	35,643.37
14	26,553	18.28	31.33	(13.05)	(346,516.65)
15	20,252	16.41	31.11	(14.70)	(297,704.40)
16	7,571	27.49	29.27	(1.78)	(13,476.38)
17	11,542	21.44	28.90	(7.46)	(86,103.32)
18	9,661	15.87	36.32	(20.45)	(197,567.45)
19	17,033	17.39	29.75	(12.36)	(210,527.88)
20	4,233	19.58	29.23	(9.65)	(40,848.45)
21	5,265	25.35	29.85	(4.50)	(23,692.50)
22	5,481	23.68	27.65	(3.97)	(21,759.57)
23	3,317	51.83	32.03	19.80	65,676.60
24	4,099	54.37	29.42	24.95	102,270.05
25	31,075	24.39	31.79	(7.40)	(229,955.00)
26	17,407	24.16	35.58	(11.42)	(198,787.94)
27	8,115	27.71	31.01	(3.30)	(26,779.50)
28	34,540	22.93	33.50	(10.57)	(365,087.80)
29	567	113.80	38.10	75.70	42,921.90
30	5,256	46.17	31.27	14.90	78,314.40
31	2,238	57.29	31.28	26.01	58,210.38
32	3,832	63.00	35.89	27.11	103,885.52
33	2,033	41.53	25.46	16.07	32,670.31
34	2,303	43.45	36.56	6.89	15,867.67
35	2,855	31.13	35.29	(4.16)	(11,876.80)
36	13,787	22.39	32.69	(10.30)	(142,006.10)
37	864	67.43	34.99	32.44	28,028.16
38	8,288	35.33	34.23	1.10	9,116.80
39	3,409	53.21	33.62	19.59	66,782.31
40	9,011	31.78	35.04	(3.26)	(29,375.86)
41	5,545	33.36	34.47	(1.11)	(6,154.95)

42	4,203	54.96	33.74	21.22	89,187.66
43	11,034	25.02	34.65	(9.63)	(106,257.42)
44	1,479	43.91	30.71	13.20	19,522.80
45	6,821	32.79	30.95	1.84	12,550.64
46	1,369	48.21	35.27	12.94	17,714.86
47	4,133	36.06	30.27	5.79	23,930.07
48	1,698	32.41	31.59	0.82	1,392.36
49	1,824	12.54	43.97	(31.43)	(57,328.32)
50	22,837	23.90	34.71	(10.81)	(246,867.97)
51	1,840	56.02	28.20	27.82	51,188.80
52	1,668	45.88	33.89	11.99	19,999.32
53	3,320	37.72	35.82	1.90	6,308.00
54	7,767	31.57	30.21	1.36	10,563.12
55	12,846	23.71	34.50	(10.79)	(138,608.34)
56	864	54.56	35.10	19.46	16,813.44
57	<u>1,371</u>	62.00	38.61	23.39	<u>32,067.69</u>
page 1 total	394,483				(1,376,275.88)
58	8,659	23.09	\$32.20	(9.11)	(78,883.49)
59	1,098	61.18	32.52	28.66	31,468.68
60	3,580	34.86	34.33	0.53	1,897.40
61	1,649	42.13	30.94	11.19	18,452.31
62	3,167	42.17	31.83	10.34	32,746.78
63	6,011	23.51	27.62	(4.11)	(24,705.21)
64	887	19.28	35.67	(16.39)	(14,537.93)
65	18,363	18.76	35.63	(16.87)	(309,783.81)
66	3,723	37.13	35.14	1.99	7,408.77
67	5,419	33.25	31.46	1.79	9,700.01
68	2,229	58.97	38.01	20.96	46,719.84
69	5,265	27.11	35.28	(8.17)	(43,015.05)
70	566	92.16	34.23	57.93	32,788.38
71	937	54.90	28.72	26.18	24,530.66
72	1,036	100.93	38.95	61.98	64,211.28
73	4,747	43.45	37.31	6.14	29,146.58
74	5,077	51.71	32.54	19.17	97,326.09
75	2,590	55.84	30.98	24.86	64,387.40
76	1,456	70.96	33.42	37.54	54,658.24
77	2,272	42.99	38.95	4.04	9,178.88
78	20,646	29.16	36.61	(7.45)	(153,812.70)
79	11,758	19.08	38.42	(19.34)	(227,399.72)
80	6,593	30.88	36.01	(5.13)	(33,822.09)
81	3,925	45.24	30.43	14.81	58,129.25
82	3,608	43.50	31.85	11.65	42,033.20
83	7,528	34.18	33.42	0.76	5,721.28
84	844	52.95	31.21	21.74	18,348.56
85	11,429	17.39	33.13	(15.74)	(179,892.46)
86	21,738	19.28	29.58	(10.30)	(223,901.40)
87	34,430	17.67	31.79	(14.12)	(486,151.60)
88	33,927	18.00	31.60	(13.60)	(461,407.20)
89	19,538	22.79	29.57	(6.78)	(132,467.64)
90	17,265	30.07	35.60	(5.53)	(95,475.45)
91	11,592	29.93	32.98	(3.05)	(35,355.60)
92	3,351	31.37	30.31	1.06	3,552.06
93	8,989	26.53	34.59	(8.06)	(72,451.34)
94	5,934	30.54	33.17	(2.63)	(15,606.42)
95	8,377	36.21	33.68	2.53	21,193.81

96	6,276	30.72	36.16	(5.44)	(34,141.44)
97	8,272	41.15	34.98	6.17	51,038.24
98	1,524	62.97	37.79	25.18	38,374.32
99	3,955	47.72	38.96	8.76	34,645.80
100	745	78.72	37.09	41.63	31,014.35
101	35,297	23.73	31.46	(7.73)	(272,845.81)
102	3,542	36.89	33.00	3.89	13,778.38
103	2,029	52.14	34.39	17.75	36,014.75
104	2,134	61.78	32.56	29.22	62,355.48
105	5,438	34.80	33.76	1.04	5,655.52
106	1,264	56.05	33.24	22.81	28,831.84
107	4,330	25.87	34.49	(8.62)	(37,324.60)
108	52,478	17.16	34.06	(16.90)	(886,878.20)
109	11,160	14.93	34.34	(19.41)	(216,615.60)
110	29,311	15.42	31.77	(16.35)	(479,234.85)
111	26,454	15.76	31.60	(15.84)	(419,031.36)
112	18,392	18.18	34.13	(15.95)	(293,352.40)
113	41,888	16.24	34.01	(17.77)	(744,349.76)
114	<u>360</u>	15.76	34.41	(18.65)	<u>(6,714.00)</u>
page 2 total	565,052				(5,003,848.99)
115	11,620	79.90	36.27	43.63	506,980.60
116	22,765	13.72	32.66	(18.94)	(431,169.10)
117	39,467	16.03	37.45	(21.42)	(845,383.14)
118	32,140	16.39	36.86	(20.47)	(657,905.80)
119	15,575	15.56	35.01	(19.45)	(302,933.75)
120	14,151	21.33	34.42	(13.09)	(185,236.59)
121	7,866	36.62	33.33	3.29	25,879.14
122	3,111	34.76	33.67	1.09	3,390.99
123	40,155	22.14	37.66	(15.52)	(623,205.60)
124	22,584	22.99	35.98	(12.99)	(293,366.16)
125	10,097	35.14	30.1	5.04	50,888.88
126	977	78.55	34.59	43.96	42,948.92
127	5,195	42.33	33.22	9.11	47,326.45
128	3,094	40.85	30.52	10.33	31,961.02
129	0	0	37.03	(37.03)	0.00
130	17,646	15.98	37.03	(21.05)	(371,448.30)
131	2,054	19.14	29.67	(10.53)	(21,628.62)
132	12,997	19.04	32.25	(13.21)	(171,690.37)
133	14,296	18.10	36.36	(18.26)	(261,044.96)
134	82	64.83	105.80	(40.97)	(3,359.54)
135	36,429	15.50	31.26	(15.76)	(574,121.04)
136	24,793	16.84	33.07	(16.23)	(402,390.39)
137	5,366	15.17	39.78	(24.61)	(132,057.26)
138	24,765	16.08	33.03	(16.95)	(419,766.75)
139	16,094	16.24	32.33	(16.09)	(258,952.46)
140	13,851	17.57	44.85	(27.28)	(377,855.28)
141	29,406	14.94	31.75	(16.81)	(494,314.86)
142	6,693	16.43	43.21	(26.78)	(179,238.54)
143	7,099	29.60	33.11	(3.51)	(24,917.49)
144	15,475	18.51	30.94	(12.43)	(192,354.25)
145	2,119	40.31	32.61	7.70	16,316.30
146	10,548	33.92	34.32	(0.40)	(4,219.20)
147	12,625	18.92	30.61	(11.69)	(147,586.25)
148	4,810	20.03	30.52	(10.49)	(50,456.90)
149	4,702	27.70	30.96	(3.26)	(15,328.52)

150	9,568	30.74	30.19	0.55	5,262.40
151	543	76.49	31.97	44.52	24,174.36
152	8,662	41.95	33.02	8.93	77,351.66
153	3,894	40.98	36.15	4.83	18,808.02
154	720	83.28	30.64	52.64	37,900.80
155	5,534	33.62	34.56	(0.94)	(5,201.96)
156	888	73.79	35.27	38.52	34,205.76
157	4,702	32.13	30.45	1.68	7,899.36
158	5,585	32.91	37.85	(4.94)	(27,589.90)
159	7,677	36.18	29.86	6.32	48,518.64
160	3,429	32.94	31.65	1.29	4,423.41
161	6,554	32.84	29.48	3.36	22,021.44
162	1,177	56.38	31.45	24.93	29,342.61
163	8,591	27.79	34.73	(6.94)	(59,621.54)
164	4,394	51.03	31.67	19.36	85,067.84
165	1,502	56.20	34.48	21.72	32,623.44
166	13,952	20.24	35.76	(15.52)	(216,535.04)
167	858	62.94	34.94	28.00	24,024.00
168	2,429	65.83	32.56	33.27	80,812.83
169	5,884	47.26	34.80	12.46	73,314.64
170	2,678	36.01	32.71	3.30	8,837.40
171	<u>3,856</u>	44.78	30.29	14.49	<u>55,873.44</u>
page 3 total	593,724				(6,354,725.21)
172	8,515	26.79	35.69	(8.90)	(75,783.50)
173	2,334	46.20	40.19	6.01	14,027.34
174	2,034	53.58	30.38	23.20	47,188.80
175	6,735	42.26	29.30	12.96	87,285.60
176	19,876	28.32	32.70	(4.38)	(87,056.88)
177	5,086	35.65	34.40	1.25	6,357.50
178	9,081	25.15	36.20	(11.05)	(100,345.05)
179	1,305	46.98	37.02	9.96	12,997.80
180	992	63.49	34.59	28.90	28,668.80
181	2,271	50.77	31.48	19.29	43,807.59
182	3,102	31.25	32.34	(1.09)	(3,381.18)
183	1,543	46.67	26.07	20.60	31,785.80
184	6,256	26.88	33.15	(6.27)	(39,225.12)
185	1,098	63.49	33.49	30.00	32,940.00
186	4,511	38.98	33.07	5.91	26,660.01
187	4,637	30.46	33.90	(3.44)	(15,951.28)
188	2,514	34.78	35.87	(1.09)	(2,740.26)
189	1,369	56.13	40.59	15.54	21,274.26
190	2,853	45.90	30.86	15.04	42,909.12
191	631	79.99	35.22	44.77	28,249.87
192	9,347	35.21	33.99	1.22	11,403.34
193	1,691	64.81	34.62	30.19	51,051.29
194	1,385	54.89	34.38	20.51	28,406.35
195	<u>3,804</u>	55.54	34.34	21.20	<u>80,644.80</u>
page 4 total	102,970				271,175.00
All centers	1,656,229				(\$12,463,675.08)