



September 5th, 2016

VIA E-FILING

Director, Beth W. Salak
Florida Public Service Commission
OFFICE OF TELECOMMUNICATIONS
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

RE: Data Request for Docket No. 160016-TX - Application for designation as eligible telecommunications carrier (ETC) by Integrated Path Communications LLC.

Dear Director, Beth W. Salak,

Enclosed for filing is **Integrated Path Communications, LLC's** response to 4th **Data Request for Docket No. 160016-TX - Application for designation as eligible telecommunications carrier (ETC) by Integrated Path Communications LLC.**

Also enclosed is a separate letter requesting CONFIDENTIAL TREATMENT of **Integrated Path Communications, LLC's** answer to numbers 79, 80, 83 and 85. Accordingly, this CONFIDENTIAL TREATMENT is being requested pursuant to statutory confidential provisions of Section 364.183, Florida Statutes, and Rule 25-22.006, Florida Administrative Code.

Please acknowledge receipt of this filing by returning via email to bshepard@ipc-llc.com or via fax (518-325-1397) this cover letter file stamped received.

Questions regarding this filing may be directed to Brian Shepard at 518-325-1396 or email to bshepard@ipc-llc.com.

Sincerely,

Brian Shepard
President - Integrated Path Communications, LLC

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CLERK

September 5th, 2016

Florida Public Service Commission
Office of Commission Clerk
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

RE: 4th Data Request for Docket No. 160016-TX - Application for designation as eligible telecommunications carrier (ETC) by Integrated Path Communications LLC - CONFIDENTIAL TREATMENT REQUESTED

To Whom It May Concern:

Enclosed please find a manila envelope marked "CONFIDENTIAL" containing one original copy of Integrated Path Communications, LLC's Responses to **4th Data Request for Docket No. 160016-TX questions 79, 80, 83 and 85** which are being filed in conjunction with **4th Data Request for Docket No. 160016-TX - Application for designation as eligible telecommunications carrier (ETC) by Integrated Path Communications LLC** within the State of Florida.

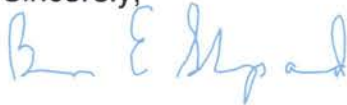
The Applicant hereby requests confidential treatment for its responses to **4th Data Request for Docket No. 160016-TX questions 79, 80, 83 and 85**, due to competitive market reasons, to statutory confidential provisions of Section 364.183, Florida Statutes, and Rule 25-22.006, Florida Administrative Code.

I have enclosed one original copy of each in the manila envelope. There are two edited copies of each where the information claimed as confidential is redacted out, in the response to **4th Data Request for Docket No. 160016-TX - Application for designation as eligible telecommunications carrier (ETC) by Integrated Path Communications LLC** section marked "Response: 79, Response: 80, Response: 83 and Response: 85".

Please acknowledge receipt of this filing by returning via email to bshepard@ipc-llc.com or via fax (518-325-1396), the file-stamped extra copy of this cover letter. Also please send the original file-stamped copy in the self-addressed stamped envelope provided for that purpose.

Questions regarding this filing may be directed to Brian Shepard at 518-325-1396 or emailed to filings@ipc-llc.com

Sincerely,



Brian Shepard
President - Integrated Path Communications, LLC

4th Data Request for Docket No. 160016-TX

73. Please confirm that Integrated Path Communications LLC (Integrated Path) currently operates in the following states: Florida, Kentucky, New York, Vermont, Wisconsin, Oklahoma, Texas, California, and Oregon. If this list is incomplete or incorrect, please identify any other states that Integrated Path is currently operating in or any state that should be removed from the list. This was asked in questions 1 and 44.

Response:

Question number 44 asked "Please review your response to number 1 in the first data request sent by staff and update as appropriate. We are seeking a comprehensive list of states(s) and federally recognized tribal land(s) in which your company currently offers service (not limited to Lifeline service in tribal lands)."

Please refer to the confidential response to question 44 as Integrated Path is only providing service on tribal lands in the areas of Wisconsin. The company is not approved to provide Lifeline service on tribal lands in New York nor Texas.

Integrated Path does not operate in Oklahoma and has never responded that it operates in Oklahoma in either question 1 or 44.

Integrated Path Communications, LLC operates in the following states:

Florida - DOCKET NO. 140152-TX, ORDER NO. PSC-15-0031-CO-TX

Kentucky - Filing No. TFS2016-00048

New York - Matter No. 10-01509

Iowa – DOCKET NO. TCU-2014-0007

Texas - Docket No. 40620

California - Decision 15-06-052

Wisconsin – Docket 2669-NC-100

74. Please confirm that Integrated Path is currently designated as an Eligible Telecommunications Carrier (ETC) in the following states: Wisconsin. If this list is incomplete, please identify any other states that Integrated Path is an ETC. This was asked in question 2.

Response:

Integrated Path responded in question 2 that it is an approved ETC in the following states: New York, Texas and Wisconsin.

Please see Attachment 1 to this response the orders from each of those states that granted ETC authority to Integrated Path.

4th Data Request for Docket No. 160016-TX

75. Please see Integrated Path's response to question 67. It indicates that Integrated Path is approved to receive High Cost support in New York and Texas. Is Integrated Path an ETC in those states? If not, how can it be eligible to receive high cost support.

Response:

Integrated Path is an ETC in New York, Texas and Wisconsin.

Please refer to Attachment 1, the orders issued by the Public Commission's of New York, Texas and Wisconsin granting ETC authority to Integrated Path.

76. Integrated Path's response to staff's question 19 provides a general outline regarding your marketing strategy (i.e. attending community events, telemarketing sales, print media, and distribution partnerships). Please provide examples of such marketing materials.

Response:

Integrated Path has not produced specific Florida related marketing materials since it has not been approved as an ETC in Florida.

Please refer to Attachment 2 for marketing material as used in the Texas market.

77. Integrated Path's response to staff's question 64 indicates that Integrated Path it is in the process of updating its website to include it Lifeline service products. Please describe what changes you have made since your response, or what changes will be made and when you expect to have those changes completed.

Response:

Integrated Path has updated its website to include information regarding the lifeline program and provides customers with information regarding the discounts they qualify for as part of the program. Customers are free to use the discount on any qualifying service offering from Integrated Path they choose.

78. Integrated Path's response to staff's question 49 states that Integrated Path has "just started marketing retail services within the state of Florida". This was followed up by question 61. Please indicate when Integrated Path started marketing retail services in Florida by geographic market, the form(s) of marketing used, and provide examples of marketing material used in Florida.

Response:

Integrated Path has been advertising on its website its service offerings in Florida since July 2016 and has begun offering service to customer in the states. Integrated Path is not targeting specific geographic locations in Florida, just areas within the AT&T service area.

4th Data Request for Docket No. 160016-TX

79. For June 17, 2016 and August 1, 2016, how many residential and business customers does Integrated Path serve in Florida? For each customer class listed above, please indicate what percent is provided through resale, unbundled network elements, or network facilities deployed by Integrated Path. For each customer class listed above, please list what percentage of customers is serviced by wireline, wireless, fixed wireless, VOIP or other service.

Response:

[REDACTED]

80. For June 17, 2016 and August 1, 2106, how many residential and business customers does Integrated Path serve in AT&T Florida's territory? For each customer class listed above, please indicate what percent is provided through resale, unbundled network elements, or network facilities deployed by Integrated Path. For each customer class listed above, please list what percentage of customers is serviced by wireline, mobile wireless, fixed wireless, VOIP or other service.

Response:

[REDACTED]

81. On May 27, 2016, Integrated Path emailed staff a letter addressed to the Seminole Tribe of Florida. This was related to question 59 of staff's questions. Has anyone from the Seminole Tribe of Florida responded to your letter? If so, please provide a copy.

Response:

No one from the Seminole Tribe of Florida has responded to our letter. We have reached out to the Director of Strategic Partnerships and to the Director IT at the Seminole Tribe. We have not received a response back to our inquiry.

4th Data Request for Docket No. 160016-TX

82. Integrated Path's response to staff's question 69 lists the wire centers for the Seminole Tribal Area. For each wire center identified, please indicate if the wire center also services areas outside of the Federally Recognized Tribal Lands.

Response:

[HLWDFLHD – HOLLYWOOD] - Wire center services areas both on the Federally Recognized Tribal lands and areas off the Federally Recognized Tribal Lands

[TAMPFLXED – TAMPACEN] - Wire center services areas both on the Federally Recognized Tribal lands and areas off the Federally Recognized Tribal Lands

[IMFLFLXAR – IMMOKALEE] - Wire center services areas both on the Federally Recognized Tribal lands and areas off the Federally Recognized Tribal Lands

[OKCBFLXAD – OKEECHOBEE] - Wire center services areas both on the Federally Recognized Tribal lands and areas off the Federally Recognized Tribal Lands

83. Integrated Path's response to staff's question 10 identifies "Brian Shepard" as the sole member and owner of Integrated Path." Included in question 10, staff asked if those identified are also owners, corporate officers or employees of any other telecommunications companies. Please provide an answer.

Response:

Brian Shepard is the sole owner and managing member of Integrated Path Communications, LLC.

[REDACTED]

- Brian Shepard also owns or is a manager of the following:
 - Integrated Path Communications – Vermont, LLC [CPG – 1002]
 - Integrated Path Communications – Oregon, LLC [DOCKET CP 1591]
 - Integrated Path Communications – Kentucky, LLC [Filing No. TFS2016-00048]

■ [REDACTED]
■ [REDACTED]
■ [REDACTED]

■ [REDACTED]

4th Data Request for Docket No. 160016-TX

84. Integrated Path's response to staff's question 50 addresses the number of staff associated with the company. For those staff members that are managers, please indicate if any have been:

- a. Involved in bankruptcy proceedings
- b. Convicted of a criminal offense
- c. Involved in civil litigation in which they have been deposed or been a plaintiff, a defendant or a witness

Response:

None of the managers have been involved in a bankruptcy proceeding, convicted of a criminal offense, nor have been involved in civil litigation in which they have been deposed or been a plaintiff, a defendant or a witness.

85. Integrated Path's response to question 57 notes that Integrated Path has its "own facilities switch". Please describe this switch in terms of brand, make, model, capacity, and types of services that can be provisioned. Please specify if Integrated Path owns this switch or it if leases it.

Response:

OWNER	SWITCH CLI	SWITCH MODEL TYPE			SWITCH LOCATION
IPC LLC	DLLSTX9715T	Cisco AS5400 HPX			1950 N STEMMONS FWY STE 1032 DALLAS TX 75207
IPC LLC	DLLSTX97DSU	Cisco AS5400 HPX			1950 N STEMMONS FWY STE 1032 DALLAS TX 75207
IPC LLC	FRMTCAJYDS0	Cisco AS5400 HPX			48233 Warm Springs Blvd. Fremont, CA
IPC LLC	GLVVDNY97DS0	Cisco AS5400 HPX			48 South Main St. Gloversville, NY
IPC LLC	HLDLNY0600T	Cisco AS5400 HPX			9030 State Route 22 Suite 3 Hillsdale, NY 12529
IPC LLC	HLDLNY06DS0	Cisco AS5400 HPX			9030 State Route 22 Suite 3 Hillsdale, NY 12529
IPC LLC	MIASFLLTDS1	Cisco AS5400 HPX			36 NE 2nd ST, STE 400, Miami, FL 33132
IPC LLC	MNTIIAAKDS0	Cisco AS5400 HPX			24253 HWY 151 Richland, IA 52310
IPC LLC	NYCMNYZRG56	Cisco AS5400 HPX			60 Hudson St. New York NY
IPC LLC	ROCHNYKZD50	Cisco AS5400 HPX			28 Mansfield Street Rochester, NY

Attachment 1

**Orders from NY PSC, PSC of Wisconsin and PUC of
Texas granting ETC authority to Integrated Path
Communications, LLC**

STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

At a session of the Public Service
Commission held in the City of
Albany on November 19, 2015

COMMISSIONERS PRESENT:

Audrey Zibelman, Chair
Patricia L. Acampora
Gregg C. Sayre
Diane X. Burman

CASE 15-C-0178 - Petition of Integrated Path Communications, LLC
for Designation as an Eligible
Telecommunications Carrier.

ORDER APPROVING DESIGNATION
AS ELIGIBLE TELECOMMUNICATIONS CARRIER

(Issued and Effective November 19, 2015)

BY THE COMMISSION:

INTRODUCTION

By petition dated March 26, 2015, Integrated Path Communications, LLC (IPC or the Company) requested designation as an eligible telecommunications carrier (ETC) for the purposes of determining universal service obligations and eligibility to receive federal universal service funding, pursuant to §§214 and 254 of the Communications Act of 1934, as amended, (the Act) and §§54.101 through 54.207 of Title 47 of the Code of Federal Regulations (47 CFR). The Company provides the requisite telephone services designated by the Federal Communications Commission (FCC) for a carrier to be eligible for federal universal service support. Upon thorough review of the Company's petition and tariff, New York State Department of Public Service Staff (Staff) recommends that IPC's petition be approved for the limited purpose of participating in the FCC's low-income universal support program (Lifeline) and that its

service area for defining such support be limited to the non-rural and rural voice telephony exchanges served by Citizen Telecommunications Company of New York, Inc., Frontier Telephone of Rochester, Inc. and Taconic Corporation d/b/a FairPoint Communications.

BACKGROUND

Section 214 of the Act requires state commissions to designate eligible telecommunications carriers for the purposes of determining universal service obligations and eligibility to receive federal universal service funding. Section 214 also requires state commissions to define the service area of the carriers and, when appropriate, to grant waivers of certain requirements.

By Commission Order issued December 1, 1997, the 40 Incumbent Local Exchange Carriers (ILECs) in New York were certified to be eligible for universal service purposes. Subsequently, 23 Competitive Local Exchange Carriers (CLECs) have been designated as eligible carriers by various Commission Orders.¹

PETITION

The Company's petition to receive ETC designation is for the purpose of receiving low income support (Lifeline) only, pursuant to §214 of the Act. IPC stated that it meets the requirements to qualify as an ETC² because it provides the following services:

- a) Voice grade access to the public switched network;

¹ Seven of the 23 CLECs have either gone out of business or have withdrawn their ETC designation.

² These requirements are set forth in 47 CFR 54.101(C).

DISCUSSION AND CONCLUSION

Based on our review of IPC's petition, we determine that the Company satisfies the requirements for designation as an ETC for the purpose of receiving federal universal service support for low income programs pursuant to §§214(e)2) and 214(e) (6) of the Act and §54.101 through §54.207 of 47 CFR. The list of services provided by IPC is identical to the services required by the FCC for designation of a carrier as eligible for federal universal support.³ Accordingly, we find that IPC's petition is in the public interest and the Company qualifies as an eligible telecommunications carrier for purposes of participating in federal universal service low income support programs.

The Commission orders:

1. The Commission approves Integrated Path Communications, LLC's petition for designation as an eligible telecommunications carrier for the purpose of receiving federal universal service support for low income programs. Its service area as limited to the non-rural and rural voice telephony exchanges served by Citizen Telecommunications Company of New York, Inc., Frontier Telephone of Rochester, Inc. and Taconic Corporation d/b/a FairPoint Communications.

³ In its November 18, 2011 Report and Order and Notice of Proposed Rulemaking (WC Docket 10-90: Connect America Fund), the FCC amended Section 54.101(a) of its rules to specify that access to operator services and access to directory assistance are no longer "services designated for support" under the Universal Service Fund program. Also, the federal Linkup program was discontinued consistent with the FCC's requirements in its Lifeline and Link-up Reform and Modernization, Report and Order and Further Notice of Proposed Rulemaking, WC Docket No. 11-42, FCC 12-11 published in February 2012.

- b) Local usage;
- c) Access to emergency services, including access to 911 or E911;
- d) Lifeline and free toll limitation services for qualifying low-income customers; and,
- e) Voice telephony service.

The Company was originally certified in New York on August 6, 2010 in Matter No. 10-01509 to operate as a reseller of telecommunications services with authority to provide local exchange services. The Company's tariff, PSC No. 1 - Telephone, provides the services listed above. IPC noted in its petition that it will advertise the availability and charges for such services in media of general distribution as required by §214(e)(1) of the Act. Finally, IPC has submitted supporting documentation demonstrating that it is financially and technically capable of providing the supported Lifeline service.

The petition also specified that the Company's service area would consist of the non-rural and rural exchanges served by Citizen Telecommunications Company of New York, Inc., Frontier Telephone of Rochester, Inc. and Taconic Corporation d/b/a FairPoint Communications, and that it will provide its services through either its own facilities or a combination of its own facilities and resale of another carrier's services.

Pursuant to 47 CFR, §54.101, before designating an additional eligible telecommunications carrier for an area served by a rural telephone company, a state commission shall find that the designation is in the public interest. Accordingly, on September 18, 2015, IPC supplemented its petition with affirmative public interest statements for each of the three service areas. Specifically, the Company asserted that IPC's ETC status will improve the quality and affordability of services to consumers in each of its service areas.

8. It is reasonable to require that Integrated Path file periodic reports, as described in the opinion section of this Final Decision, on the numbers of phones disconnected due to no usage in a 60-day period.

9. It is reasonable and in the public interest to designate Integrated Path as an ETC for the purpose of receiving Lifeline support in the Park Falls exchange, as indicated in its application and consistent with this Final Decision.

Conclusions of Law

1. The Commission has jurisdiction and authority under Wis. Stat. §§ 196.02, 196.016, and 196.218; Wis. Admin. Code ch. PSC 160; 47 U.S.C. §§ 214 and 254; and other pertinent provisions of Wis. Stat. ch. 196 and the Federal Telecommunications Act of 1996 to make the Findings of Fact and to issue this Final Decision.

2. The Commission has the authority to adopt different ETC requirements under Wis. Admin. Code § PSC 160.01(2)(b).

Opinion

ETC status was created by the 1996 Telecommunications Act and codified in 47 U.S.C. § 214(e)(2). Under Federal Communications Commission (FCC) regulations 47 U.S.C. § 214(e)(2) and 47 C.F.R. § 54.201(b), state commissions designate providers as ETCs. Designation as an ETC is required if a provider is to receive federal universal service funding. ETC designation is also required to receive funding from the state universal service High Rate Assistance Credit program.

The FCC has established a set of minimum criteria that all ETCs must meet, which, is codified at 47 U.S.C. § 214(e)(1) and 47 C.F.R. § 54.101(a), *et seq.* States have the authority to

2. This case is closed.

By the Commission,

(SIGNED)

KATHLEEN H. BURGESS
Secretary

SERVICE DATE
Mar 04, 2016

Public Service Commission of Wisconsin
RECEIVED: 03/04/16, 3:38:01 PM

PUBLIC SERVICE COMMISSION OF WISCONSIN

Application of Integrated Path Communications LLC for Designation as
an Eligible Telecommunications Carrier

2669-TI-100

ORDER

This is the Final Decision in the investigation to determine whether to designate Integrated Path Communications LLC (Integrated Path), as an Eligible Telecommunications Carrier (ETC), pursuant to 47 U.S.C. § 214(e)(2) and Wis. Admin. Code § PSC 160.13. Designation as an ETC makes a provider eligible to receive federal and state Universal Service Fund (USF) monies. Integrated Path is seeking designation solely for the purpose of receiving USF support for low income programs. This Final Decision designates Integrated Path as an ETC only for the purposes of receiving low-income financial support for the non-rural areas of Wisconsin.

Introduction

Integrated Path filed a petition for designation as an ETC on December 15, 2015,¹ requesting ETC designation for the purpose of receiving low income program support. The Commission issued a notice requesting comments on January 28, 2016, with comments due on or before February 12, 2016. No comments were filed.

Findings of Fact

1. Integrated Path is a facilities-based competitive local exchange carrier (CLEC) offering wireless and wireline services throughout the non-rural areas of Wisconsin.

¹ See [Application for Designation as an Eligible Telecommunications Provider - 279176](#)

2. Integrated Path has committed to providing service to all requesting customers, and to advertising the availability of its service, throughout the area in which it is designated as an ETC as required under 47 U.S.C. § 214(e) and Wis. Admin. Code § PSC 160.13.

3. Integrated Path operates as a facilities-based CLEC in Wisconsin and other states. It provides service to its local customers over a combination of Unbundled Network Element facilities and those leased and/or resold from other companies. By doing so, Integrated Path meets the “own-facilities” requirement found in 47 U.S.C. § 214(e)(1)(A).

4. Integrated Path has committed to providing service that meets most of the requirements set forth in Wis. Admin. Code § PSC 160.13. Integrated Path has sought modification of the minimum monthly charge requirement for lifeline service as discussed below. Integrated Path had also requested a waiver of the payphone provision previously contained in Wis. Admin. Code s. 160.13, but that provision has recently been removed.

5. It is reasonable to require Integrated Path to provide a monthly credit in the form of minutes, in lieu of the dollar discounts set forth in Wis. Admin. Code § PSC 160.062(2)(b) for its prepaid wireless customers.

6. It is reasonable to *not* require Integrated Path to charge a minimum monthly fee as set forth in Wis. Admin. Code § PSC 160.062(2)(c) to such customers.

7. It is reasonable to require that Integrated Path discontinue service to, and collection of Lifeline support related to, any prepaid Lifeline phone with no usage in a 60-day period.

Docket 2669-TI-100

adopt additional requirements, provided that the additional requirements are “not inconsistent with the FCC’s rules to preserve and advance universal service.” 47 U.S.C. § 254(f).

The United States Court of Appeals for the Fifth Circuit upheld a state’s right to impose additional conditions on ETCs in *Texas Office of Public Utility Counsel v. FCC*, 183 F.3d 393, 418 (5th Cir. 1999).

The Commission promulgated Wis. Admin. Code ch. PSC 160 and specifically Wis. Admin. Code § PSC 160.13 to govern ETC designations and requirements in Wisconsin. Those rules established the process for ETC designation and set forth a minimum set of requirements for providers seeking ETC designation from the Commission. Integrated Path has committed to meeting those rules, with the exception of the payphone requirement.

Integrated Path plans to offer prepaid wireless Lifeline service without a monthly fee, in much the same manner as other providers previously designated as ETCs by the Commission.² Under its proposal, Integrated Path would supply the Lifeline customer with a cell phone at no monthly charge. In place of the traditional Lifeline service discount to the monthly rate, Integrated Path would provide a set amount of minutes, without charge, each month. Doing so would normally be at odds with Wis. Admin. Code § PSC 160.062(2)(c), which requires a minimum monthly charge for service.³ Integrated Path seeks the same treatment as other

² Other providers include TracFone Wireless, Inc. (TracFone) (docket 9385-TI-100)([PSC REF#: 114130](#)); Nexus Communication, Inc. (docket 7648-TI-101)([PSC REF#: 64142](#)); and Millennium 2000, Inc., (docket 9593-TI-100)([PSC REF#: 157902](#)).

³ Wis. Admin. Code § PSC 160.062(2)(c) states: “Notwithstanding par. (b), in no case shall the Lifeline monthly rate be less than \$3 or more than \$15.”

Docket 2669-TI-100

prepaid wireless providers, namely that no minimum charge apply. The Commission has the authority to do so under Wis. Admin. Code § PSC 160.01(2)(b).⁴

In the *TracFone* docket, the Commission expressed concern that the lack of a minimum charge would eliminate automatic notification that a customer had lost, abandoned or otherwise ceased using the service. With traditional service, this becomes apparent when the customer stops paying bills. In the earlier dockets, the Commission required the companies to develop a plan to monitor usage, to cease receiving subsidies for inactive phones, and to report certain information to the Commission on a quarterly basis. More recently, the FCC has imposed similar requirements. Integrated Path has committed to discontinue service to any cell phone that does not have usage in a two-month period, and to not seek USF reimbursement from the Lifeline program for that phone. That commitment, coupled with the reporting requirements, would meet the objectives the Commission set forth in previous dockets.

Integrated Path has requested exemption from the monthly discount set forth in Wis. Admin. Code § PSC 160.062(2)(b). Instead, Integrated Path will provide a monthly discount in the form of a set number of minutes of use to prepaid wireless customers. Initially, Integrated Path would provide customers unlimited free minutes and 2 Gigabits of data per month, in lieu of the monthly credit. In the future, this equivalency may change. The Administrator of the Division of Business and Communications Services has delegated authority to approve or deny changes to the monthly minute allocation. Changes to the number of minutes may be approved without reopening the docket, issuing a notice or providing opportunity for comment.

⁴ Wis. Admin. Code § PSC 160.01(2)(b) states: "Nothing in this chapter shall preclude special and individual consideration being given to exceptional or unusual situations and upon due investigation of the facts and circumstances involved, the adoption of requirements as to individual providers or services that may be lesser, greater, other or different than those provided in this chapter."

Docket 2669-TI-100

Providing free monthly minutes of service in lieu of a monthly discount is an alternative approach to Lifeline service. Integrated Path's business plan and status as a prepaid wireless provider together with the administrative difficulty of applying some requirements of Wis. Admin. Code ch. PSC 160 creates an unusual circumstance that justifies adopting different requirements concerning these items. The Commission adopted a different method of applying discounts and a different minimum charge in earlier dockets. It is reasonable to modify the monthly discount requirement in the administrative rules and adopt a similar approach to Integrated Path as has been adopted in past dockets.

Also, in the earlier prepaid wireless ETC dockets, the Commission required the companies to make quarterly filings of the number of customers who were deactivated after 60 days of non-usage and the number of days between the 60th day and deactivation, reported as a range and an average. It is reasonable to apply the same reporting requirements to Integrated Path.

Integrated Path also requested a waiver from the requirement that an ETC provide a pay phone in each municipality, as was previously set forth in Wis. Admin. Code §§ PSC 160.13(1)(d) and PSC 165.088. However, this provision was recently repealed so no waiver is necessary.

The FCC has determined that an applicant should be designated as an ETC only where such designation serves the public interest, regardless of whether the area for which designation is sought is served by a rural or non-rural provider.⁵ The Commission finds that it is in the public interest to designate Integrated Path as an ETC in the areas for which Integrated Path

⁵ *In the Matter of Federal-State Joint Board on Universal Service*, 20 F.C.C.R. 6371, 6373, ¶ 3 (2005).

requests such designation. The Commission finds that Integrated Path meets the requirements for ETC designation, for the limited purpose of obtaining Lifeline support.

As part of the public interest determinations for other ETCs, the Commission has considered whether there is a concern that an ETC will “cream skim” the most profitable customers. While it may not be necessary to do so in the Lifeline-only ETC context,⁶ the Commission staff has investigated this issue. Since Integrated Path has requested ETC status for the entire non-rural portion of the state, the Commission finds no evidence of cream-skimming in this docket.

Order

1. Integrated Path Telecom, LLC is designated as an ETC, for the purpose of receiving Lifeline support, throughout the non-rural areas of Wisconsin.
2. Integrated Path Telecom, LLC is an ETC within the meaning of 47 U.S.C. § 214(c), and is eligible to receive federal USF funding, for Lifeline service, pursuant to 47 U.S.C. § 254(2). This Final Decision constitutes the Commission’s certification to that effect.
3. Integrated Path does not have to meet the monetary discount or minimum charge requirements under Wis. Admin. Code § PSC 160.062(2), but Integrated Path is instead required to provide 250 minutes of free service per month to Lifeline customers. The Commission delegates to the Administrator of the Division of Business and Communications Services the authority to approve changes to that number of minutes. Changes to the number of minutes may

⁶ The FCC has identified that with respect to at least some low-income, wireless ETCs that are not seeking high-cost support, “cream skimming” is not a significant concern. *NTCH, Inc. Petition for Forbearance from 47 U.S.C. § 214(e)(5) and 47 C.F.R. § 54.207(b) Cricket Communications, Inc. Petition for Forbearance*, 26 F.C.C.R. 13,723, 13,729 (2011).

Docket 2669-TI-100

be approved without reopening the docket, issuing a notice, or providing opportunity for comment.

4. Integrated Path shall deactivate any Lifeline phone that has had no usage in a 60-day period. Integrated Path may not collect Lifeline support for phones deactivated in this manner.

5. Integrated Path shall report, on a quarterly basis, the number of customers who were deactivated after 60 days of non-usage and the number of days between the 60th day and deactivation, reported as a range and an average.

6. Jurisdiction is maintained.

7. This Final Decision is effective the day after the date of service.

Dated at Madison, Wisconsin, March 4, 2016.

For the Commission:

A handwritten signature in black ink, appearing to read 'Sarah Klein for', written over a horizontal line.

Sarah Klein
Administrator
Division of Business and Program Management

SJK:TE:CNC:PRJ DL:01295809

See attached Notice of Rights

PUBLIC SERVICE COMMISSION OF WISCONSIN
610 North Whitney Way
P.O. Box 7854
Madison, Wisconsin 53707-7854

**NOTICE OF RIGHTS FOR REHEARING OR JUDICIAL REVIEW, THE
TIMES ALLOWED FOR EACH, AND THE IDENTIFICATION OF THE
PARTY TO BE NAMED AS RESPONDENT**

The following notice is served on you as part of the Commission's written decision. This general notice is for the purpose of ensuring compliance with Wis. Stat. § 227.48(2), and does not constitute a conclusion or admission that any particular party or person is necessarily aggrieved or that any particular decision or order is final or judicially reviewable.

PETITION FOR REHEARING

If this decision is an order following a contested case proceeding as defined in Wis. Stat. § 227.01(3), a person aggrieved by the decision has a right to petition the Commission for rehearing within 20 days of the date of service of this decision, as provided in Wis. Stat. § 227.49. The date of service is shown on the first page. If there is no date on the first page, the date of service is shown immediately above the signature line. The petition for rehearing must be filed with the Public Service Commission of Wisconsin and served on the parties. An appeal of this decision may also be taken directly to circuit court through the filing of a petition for judicial review. It is not necessary to first petition for rehearing.

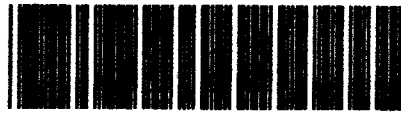
PETITION FOR JUDICIAL REVIEW

A person aggrieved by this decision has a right to petition for judicial review as provided in Wis. Stat. § 227.53. In a contested case, the petition must be filed in circuit court and served upon the Public Service Commission of Wisconsin within 30 days of the date of service of this decision if there has been no petition for rehearing. If a timely petition for rehearing has been filed, the petition for judicial review must be filed within 30 days of the date of service of the order finally disposing of the petition for rehearing, or within 30 days after the final disposition of the petition for rehearing by operation of law pursuant to Wis. Stat. § 227.49(5), whichever is sooner. If an *untimely* petition for rehearing is filed, the 30-day period to petition for judicial review commences the date the Commission serves its original decision.⁷ The Public Service Commission of Wisconsin must be named as respondent in the petition for judicial review.

If this decision is an order denying rehearing, a person aggrieved who wishes to appeal must seek judicial review rather than rehearing. A second petition for rehearing is not permitted.

Revised: March 27, 2013

⁷ See *Currier v. Wisconsin Dep't of Revenue*, 2006 WI App 12, 288 Wis. 2d 693, 709 N.W.2d 520.



Control Number: 44519



Item Number: 17

Addendum StartPage: 0

RECEIVED

APPLICATION OF INTEGRATED PATH §
COMMUNICATIONS, LLC FOR §
DESIGNATION AS AN ELIGIBLE §
TELECOMMUNICATIONS CARRIER §
(ETC) AND ELIGIBLE §
TELECOMMUNICATIONS PROVIDER §
(ETP) PURSUANT TO 16 TAC §§ 26.417 - §
26.418 §

2015 MAY 19 PM 2:11
PUBLIC UTILITY COMMISSION
PUBLIC UTILITY COMMISSION
OF TEXAS
FILING CLERK

**ORDER NO. 5
NOTICE OF APPROVAL FOR DESIGNATION AS
AN ELIGIBLE TELECOMMUNICATIONS CARRIER AND
ELIGIBLE TELECOMMUNICATIONS PROVIDER**

I. Procedural History

On March 10, 2015, Integrated Path Communications, LLC (IPC) filed a combined application for designation as an eligible telecommunications carrier (ETC) under 47 U.S.C. § 214(e) and 16 Tex. Admin. Code § 26.418 (TAC), as well as designation as an eligible telecommunications provider (ETP) under PURA¹ § 56.023 and 16 TAC § 26.417. No parties sought intervention in this proceeding. In addition, IPC sought a waiver of 16 TAC § 26.417(c)(1)(A) so that its ETC and ETP applications may be processed simultaneously.

IPC is a wireline facilities-based telecommunications services provider. IPC will utilize its own facilities, including switching equipment, in combination with facilities furnished by incumbent local exchange carriers (ILEC) and other providers, in order to provide wireline service. IPC will not be using wireless service to provide services for which it seeks universal service fund support. IPC seeks designation as a wireline ETP and ETC in 417 wire centers in the non-rural ILEC AT&T Texas service area, which are shown on Attachment A. IPC holds Service Provider Certificate of Operating Authority No. 60898.

On March 13, 2015, the Commission issued Order No. 1 in this proceeding which established a procedural schedule, including deadlines for comment, motions to intervene, and

¹ Public Utility Regulatory Act, Tex. Util. Code Ann. §§ 11.001-66.016 (Vernon 2007 & Supp. 2014) (PURA).

publication of notice in the *Texas Register*. Notice was published in the *Texas Register* on March 27, 2015. IPC provided a copy of the application to the Office of Public Utility Counsel at the time of filing. Pursuant to 16 TAC §§ 26.417(f)(2)(A)(i) and 26.418(h)(2)(A)(i), the effective date shall be no earlier than 30 days after the filing date of the application or 30 days after notice is completed, whichever is later.

On March 18, 2015, IPC amended the application to change the proposed effective date from April 25, 2015, to the new date of May 5, 2015. On May 12, 2015, Commission Staff filed a recommendation requesting approval of the application for ETC and ETP status for IPC. Pursuant to 16 TAC §§ 26.417(f)(2)(A)(v) and 26.418(h)(2)(A)(v), the presiding officer shall issue an order approving, denying, or docketing the application no later than 35 days after the proposed effective date of the application.

II. Designation as Eligible Telecommunications Carrier

To qualify for ETC status, a carrier must meet the following criteria:²

1. The carrier must be a common carrier, as that term is defined by the Federal Telecommunications Act of 1996 (FTA), Section 3(10).
2. The carrier must offer the following voice telephony services³ using its own facilities or a combination of its own facilities and the resale of another carrier's services:⁴
 - (a) Voice grade access to the public switched network or its functional equivalent;
 - (b) Minutes of use for local service provided at no additional charge to end users;
 - (c) Access to the emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911, to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems; and

² 47 C.F.R. § 54.201(b)-(d).

³ 47 C.F.R. § 54.101.

⁴ 47 C.F.R. § 54.201.

- (d) Toll limitation for qualifying low income customers.
3. The carrier must advertise the availability of the above services and charges for the services in a media of general distribution.⁵
 4. The carrier must provide Lifeline and Link Up support, and may not collect a deposit from a customer receiving such support if the customer also elects toll blocking.⁶

IPC meets all of the requirements to be designated as an ETC. In addition, IPC commits to meeting all of the additional ETC requirements as listed in 47 C.F.R. § 54.202(a)(1)(i).

III. Designation as Eligible Telecommunications Provider

To qualify for ETP status a carrier must meet the following criteria:

1. 16 TAC § 26.417(f)(1)(B)(i)(I) requires carriers applying for ETP status to meet the definition of a telecommunications provider as defined in PURA § 51.002(10). IPC meets this definition.
2. 16 TAC § 26.417(f)(1)(B)(i)(II) requires carriers applying for ETP status to show that they have been granted ETC status for federal universal service support pursuant to 47 U.S.C. § 214(e). ETC and ETP designations are being handled concurrently in this docket.
3. 16 TAC § 26.417(f)(1)(B)(i)(III) requires carriers to specify the small or rural incumbent local exchange company (ILEC) service area in which they propose to be an ETP. IPC seeks ETP designation in 417 wire centers in the non-rural ILEC AT&T Texas service area, which are shown on Attachment A to this Notice.
4. 16 TAC § 26.417(f)(1)(B)(i)(III) requires applicants for ETP status to show that they offer the designated services defined in 16 TAC § 26.403 throughout the Texas High Cost Universal Service Provider or small and rural ILEC service area

⁵ 47 C.F.R. § 54.201.

⁶ 47 C.F.R. § 54.405.

for which the carriers seek ETP status. The designated services required for ETP status are:

- (a) Flat rate, single party service, including primary directory listings;
- (b) Tone dialing;
- (c) Access to operator services;
- (d) Access to directory assistance services;
- (e) Access to 911 service when provided by local authority;
- (f) Dual party relay service;
- (g) Ability to report service problems seven days a week;
- (h) Availability of annual local directory;
- (i) Access to toll services; and
- (j) Lifeline and Link Up services.

IPC meets these requirements.

5. 16 TAC § 26.417(f)(1)(B)(i)(III) also requires applicants to assume the obligation to provide the services required under 16 TAC § 26.403 to any customer. IPC states that it meets and assumes the responsibility to offer the basic services defined in 16 TAC § 26.403 to all customers in its exchanges.
6. 16 TAC § 26.417(f)(1)(B)(i)(IV) requires that applicants show they offer the designated services through a means other than total resale. IPC indicated that it would not offer the designated services solely through any total service resale arrangements.
7. 16 TAC § 26.417(f)(1)(B)(i)(V) requires applicants to show that they have offered continuous service that meets the quality of service standards in 16 TAC § 26.52 - 26.54. IPC meets these requirements.
8. 16 TAC § 26.417(f)(1)(B)(i)(VI) requires applicants to show that they offer Lifeline and Link-Up services in compliance with 16 TAC § 26.412. IPC meets these requirements.

9. 16 TAC § 26.417(f)(1)(B)(i)(VII) requires applicants to advertise the availability of, and charges for, the designated services using media of general distribution. IPC meets this requirement.

IPC has also committed to offering the required designated services at a rate not to exceed 150% of AT&T Texas' tariffed rate in the same designated areas pursuant to the requirements of 16 TAC § 26.417(c)(1)(B).

Commission Staff's analysis of the application concludes that IPC meets the requirements established by 16 TAC § 26.417 for designation as an ETP.

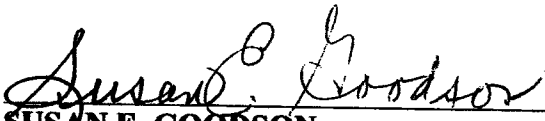
IV. Ordering Paragraphs

In accordance with these fact statements and legal conclusions, the Commission issues the following order:

1. IPC's application for ETC designation in the 417 wire centers of the non-rural ILEC AT&T Texas as identified in Attachment A to this Notice is approved effective May 5, 2015.
2. IPC's application for ETP designation in the 417 wire centers of the non-rural ILEC AT&T Texas identified in Attachment A to this Notice is approved effective May 5, 2015.
3. All other motions, requests for entry of specific findings of fact and conclusions of law, and any other requests for general or specific relief, if not expressly granted herein, are denied

SIGNED AT AUSTIN, TEXAS the 19th day of May 2015.

PUBLIC UTILITY COMMISSION OF TEXAS



SUSAN E. GOODSON
ADMINISTRATIVE LAW JUDGE

Attachment A
Docket No. 4451

	WIRE CENTER	ILEC	LATA
1	ABILENE, TX	SOUTHWESTERN BELL	550 ABILENE TX
2	ADAMSVILLE, TX	SOUTHWESTERN BELL	558 AUSTIN TX
3	ALBANY, TX	SOUTHWESTERN BELL	550 ABILENE TX
4	ALICE, TX	SOUTHWESTERN BELL	564 CORPUS CHRISTI TX
5	ALLEN, TX	SOUTHWESTERN BELL	552 DALLAS TX
6	ALLEN EACS, TX	SOUTHWESTERN BELL	552 DALLAS TX
7	ALLISON, TX	SOUTHWESTERN BELL	546 AMARILLO TX
8	ALPINE, TX	SOUTHWESTERN BELL	542 MIDLAND TX
9	ALVARADO, TX	SOUTHWESTERN BELL	552 DALLAS TX
10	ALVARADO EMS, TX	SOUTHWESTERN BELL	552 DALLAS TX
11	ALVIN, TX	SOUTHWESTERN BELL	560 HOUSTON TX
12	AMARILLO, TX	SOUTHWESTERN BELL	546 AMARILLO TX
13	ANGLETON, TX	SOUTHWESTERN BELL	560 HOUSTON TX
14	ANNA, TX	SOUTHWESTERN BELL	552 DALLAS TX
15	ANSON, TX	SOUTHWESTERN BELL	550 ABILENE TX
16	APOLLO, TX	SOUTHWESTERN BELL	560 HOUSTON TX
17	ARLINGTON, TX	SOUTHWESTERN BELL	552 DALLAS TX
18	ARLINGTON EMS, TX	SOUTHWESTERN BELL	552 DALLAS TX
19	ASHERTON, TX	SOUTHWESTERN BELL	566 SAN ANTONIO TX
20	ATLANTA, TX	SOUTHWESTERN BELL	554 LONGVIEW TX
21	ATLAS, TX	SOUTHWESTERN BELL	552 DALLAS TX
22	ATLAS EMS, TX	SOUTHWESTERN BELL	552 DALLAS TX
23	AUBREY, TX	SOUTHWESTERN BELL	552 DALLAS TX
24	AUBREY EMS, TX	SOUTHWESTERN BELL	552 DALLAS TX
25	AUSTIN, TX	SOUTHWESTERN BELL	558 AUSTIN TX
26	AXTELL, TX	SOUTHWESTERN BELL	556 WACO TX
27	BAMMEL, TX	SOUTHWESTERN BELL	560 HOUSTON TX
28	BANDERA, TX	SOUTHWESTERN BELL	566 SAN ANTONIO TX
29	BANDERA EMS, TX	SOUTHWESTERN BELL	566 SAN ANTONIO TX
30	BARKER, TX	SOUTHWESTERN BELL	560 HOUSTON TX
31	BARTLETT, TX	SOUTHWESTERN BELL	556 WACO TX
32	BASTROP, TX	SOUTHWESTERN BELL	558 AUSTIN TX
33	BASTROP EMS, TX	SOUTHWESTERN BELL	558 AUSTIN TX
34	BATESVILLE, TX	SOUTHWESTERN BELL	566 SAN ANTONIO TX
35	BAY CITY, TX	SOUTHWESTERN BELL	560 HOUSTON TX
36	BAYSIDE, TX	SOUTHWESTERN BELL	564 CORPUS CHRISTI TX
37	BEAUMONT, TX	SOUTHWESTERN BELL	562 BEAUMONT TX
38	BEEVILLE, TX	SOUTHWESTERN BELL	564 CORPUS CHRISTI TX
39	BELLEVUE, TX	SOUTHWESTERN BELL	548 WICHITA FALLS TX
40	BELLVILLE, TX	SOUTHWESTERN BELL	560 HOUSTON TX

	WIRE CENTER	ILEC	LATA
41	BELTON, TX	SOUTHWESTERN BELL	556 WACO TX
42	BENAVIDES, TX	SOUTHWESTERN BELL	564 CORPUS CHRISTI TX
43	BIG SPRING, TX	SOUTHWESTERN BELL	542 MIDLAND TX
44	BIG WELLS, TX	SOUTHWESTERN BELL	566 SAN ANTONIO TX
45	BORGER, TX	SOUTHWESTERN BELL	546 AMARILLO TX
46	BOWIE, TX	SOUTHWESTERN BELL	548 WICHITA FALLS TX
47	BRACKETVILLE, TX	SOUTHWESTERN BELL	566 SAN ANTONIO TX
48	BRECKENRIDGE, TX	SOUTHWESTERN BELL	552 DALLAS TX
49	BRENHAM, TX	SOUTHWESTERN BELL	560 HOUSTON TX
50	BRIDGE CITY, TX	SOUTHWESTERN BELL	562 BEAUMONT TX
51	BROWNSVILLE, TX	SOUTHWESTERN BELL	568 BROWNSVILLE TX
52	BRUNI, TX	SOUTHWESTERN BELL	564 CORPUS CHRISTI TX
53	BUNA, TX	SOUTHWESTERN BELL	562 BEAUMONT TX
54	BURKBURNETT, TX	SOUTHWESTERN BELL	548 WICHITA FALLS TX
55	CALLEN, TX	SOUTHWESTERN BELL	564 CORPUS CHRISTI TX
56	CALVERT, TX	SOUTHWESTERN BELL	570 HEARNE TX
57	CAMERON, TX	SOUTHWESTERN BELL	556 WACO TX
58	CAMPBELLTON, TX	SOUTHWESTERN BELL	566 SAN ANTONIO TX
59	CAMPBELLTON EMS, TX	SOUTHWESTERN BELL	566 SAN ANTONIO TX
60	CANADIAN, TX	SOUTHWESTERN BELL	546 AMARILLO TX
61	CANUTILLO, TX	SOUTHWESTERN BELL	540 EL PASO TX
62	CANYON, TX	SOUTHWESTERN BELL	546 AMARILLO TX
63	CARRIZO SPRINGS, TX	SOUTHWESTERN BELL	566 SAN ANTONIO TX
64	CARTHAGE, TX	SOUTHWESTERN BELL	554 LONGVIEW TX
65	CASTROVILLE, TX	SOUTHWESTERN BELL	566 SAN ANTONIO TX
66	CASTROVILLE EMS, TX	SOUTHWESTERN BELL	566 SAN ANTONIO TX
67	CATARINA, TX	SOUTHWESTERN BELL	566 SAN ANTONIO TX
68	CEDAR HIL, TX	SOUTHWESTERN BELL	552 DALLAS TX
69	CEDAR HILL EMS, TX	SOUTHWESTERN BELL	552 DALLAS TX
70	CELINA, TX	SOUTHWESTERN BELL	552 DALLAS TX
71	CENTER, TX	SOUTHWESTERN BELL	560 HOUSTON TX
72	CHANNELVIEW, TX	SOUTHWESTERN BELL	560 HOUSTON TX
73	CHILDRESS, TX	SOUTHWESTERN BELL	548 WICHITA FALLS TX
74	CHILICOTHE, TX	SOUTHWESTERN BELL	548 WICHITA FALLS TX
75	CHINA, TX	SOUTHWESTERN BELL	562 BEAUMONT TX
76	CHINA SPRING, TX	SOUTHWESTERN BELL	556 WACO TX
77	CHIRENO, TX	SOUTHWESTERN BELL	560 HOUSTON TX
78	CHRISTINE, TX	SOUTHWESTERN BELL	566 SAN ANTONIO TX
79	CHRISTINE EMS, TX	SOUTHWESTERN BELL	566 SAN ANTONIO TX
80	CISCO, TX	SOUTHWESTERN BELL	552 DALLAS TX

	WIRE CENTER	ILEC	LATA
81	CLARKWOOD, TX	SOUTHWESTERN BELL	564 CORPUS CHRISTI TX
82	CLEBURNE, TX	SOUTHWESTERN BELL	552 DALLAS TX
83	CLEBURNE EMS, TX	SOUTHWESTERN BELL	552 DALLAS TX
84	CLEVELAND, TX	SOUTHWESTERN BELL	560 HOUSTON TX
85	CLINT, TX	SOUTHWESTERN BELL	540 EL PASO TX
86	CLUTE-LAKE JACKSON, TX	SOUTHWESTERN BELL	560 HOUSTON TX
87	COLORADO CITY, TX	SOUTHWESTERN BELL	550 ABILENE TX
88	COLUMBUS, TX	SOUTHWESTERN BELL	560 HOUSTON TX
89	COMBINE, TX	SOUTHWESTERN BELL	552 DALLAS TX
90	COMBINE EMS, TX	SOUTHWESTERN BELL	552 DALLAS TX
91	CORPUS CHRISTI, TX	SOUTHWESTERN BELL	564 CORPUS CHRISTI TX
92	CORRIGAN, TX	SOUTHWESTERN BELL	560 HOUSTON TX
93	CORSICANA, TX	SOUTHWESTERN BELL	552 DALLAS TX
94	COTULLA, TX	SOUTHWESTERN BELL	566 SAN ANTONIO TX
95	CRANDALL, TX	SOUTHWESTERN BELL	552 DALLAS TX
96	CRANDALL EMS, TX	SOUTHWESTERN BELL	552 DALLAS TX
97	CRANE, TX	SOUTHWESTERN BELL	542 MIDLAND TX
98	CRYSTAL CITY, TX	SOUTHWESTERN BELL	566 SAN ANTONIO TX
99	CUERO, TX	SOUTHWESTERN BELL	564 CORPUS CHRISTI TX
100	CUERO EACS, TX	SOUTHWESTERN BELL	564 CORPUS CHRISTI TX
101	CYPRESS, TX	SOUTHWESTERN BELL	560 HOUSTON TX
102	CYPRESS EMS, TX	SOUTHWESTERN BELL	560 HOUSTON TX
103	DALLAS, TX	SOUTHWESTERN BELL	552 DALLAS TX
104	DAYTON, TX	SOUTHWESTERN BELL	560 HOUSTON TX
105	DE SOTO, TX	SOUTHWESTERN BELL	552 DALLAS TX
106	DE SOTO (OVILLA), TX	SOUTHWESTERN BELL	552 DALLAS TX
107	DEADWOOD, TX	SOUTHWESTERN BELL	554 LONGVIEW TX
108	DEER PARK, TX	SOUTHWESTERN BELL	560 HOUSTON TX
109	DENISON, TX	SOUTHWESTERN BELL	552 DALLAS TX
110	DEVINE, TX	SOUTHWESTERN BELL	566 SAN ANTONIO TX
111	DEVINE EMS, TX	SOUTHWESTERN BELL	566 SAN ANTONIO TX
112	DEWEYVILLE, TX	SOUTHWESTERN BELL	562 BEAUMONT TX
113	DONNA, TX	SOUTHWESTERN BELL	568 BROWNSVILLE TX
114	EAGLE LAKE, TX	SOUTHWESTERN BELL	560 HOUSTON TX
115	EAGLE PASS, TX	SOUTHWESTERN BELL	566 SAN ANTONIO TX
116	EASTLAND, TX	SOUTHWESTERN BELL	552 DALLAS TX
117	EDCOUCH, TX	SOUTHWESTERN BELL	568 BROWNSVILLE TX
118	EDDY, TX	SOUTHWESTERN BELL	556 WACO TX
119	EDGEWOOD, TX	SOUTHWESTERN BELL	552 DALLAS TX
120	EDINBURG, TX	SOUTHWESTERN BELL	568 BROWNSVILLE TX

	WIRE CENTER	ILEC	LATA
121	EDNA, TX	SOUTHWESTERN BELL	564 CORPUS CHRISTI TX
122	EL CAMPO, TX	SOUTHWESTERN BELL	560 HOUSTON TX
123	EL PASO, TX	SOUTHWESTERN BELL	540 EL PASO TX
124	ELGIN, TX	SOUTHWESTERN BELL	558 AUSTIN TX
125	ELGIN EMS, TX	SOUTHWESTERN BELL	558 AUSTIN TX
126	ENCINAL, TX	SOUTHWESTERN BELL	566 SAN ANTONIO TX
127	ENNIS, TX	SOUTHWESTERN BELL	552 DALLAS TX
128	ENNIS EMS, TX	SOUTHWESTERN BELL	552 DALLAS TX
129	EULESS, TX	SOUTHWESTERN BELL	552 DALLAS TX
130	EULESS EMS, TX	SOUTHWESTERN BELL	553 DALLAS TX
131	EVADALE, TX	SOUTHWESTERN BELL	562 BEAUMONT TX
132	FALCON HEIGHTS, TX	SOUTHWESTERN BELL	568 BROWNSVILLE TX
133	FANNETT, TX	SOUTHWESTERN BELL	562 BEAUMONT TX
134	FARMERSVILLE, TX	SOUTHWESTERN BELL	552 DALLAS TX
135	FARMERSVILLE EMS, TX	SOUTHWESTERN BELL	552 DALLAS TX
136	FLATONIA, TX	SOUTHWESTERN BELL	564 CORPUS CHRISTI TX
137	FLOUR BLUFF, TX	SOUTHWESTERN BELL	564 CORPUS CHRISTI TX
138	FLOYDADA, TX	SOUTHWESTERN BELL	544 LUBBOCK TX
139	FORNEY, TX	SOUTHWESTERN BELL	552 DALLAS TX
140	FORNEY EMS, TX	SOUTHWESTERN BELL	552 DALLAS TX
141	FORT DAVIS, TX	SOUTHWESTERN BELL	542 MIDLAND TX
142	FORT STOCKTON, TX	SOUTHWESTERN BELL	542 MIDLAND TX
143	FORT WORTH, TX	SOUTHWESTERN BELL	552 DALLAS TX
144	FREEPORT, TX	SOUTHWESTERN BELL	560 HOUSTON TX
145	FREER, TX	SOUTHWESTERN BELL	564 CORPUS CHRISTI TX
146	FRIENDWOOD, TX	SOUTHWESTERN BELL	560 HOUSTON TX
147	FRISCO, TX	SOUTHWESTERN BELL	552 DALLAS TX
148	FRISCO EACS, TX	SOUTHWESTERN BELL	552 DALLAS TX
149	GAINSVILLE, TX	SOUTHWESTERN BELL	552 DALLAS TX
150	GALVESTON, TX	SOUTHWESTERN BELL	560 HOUSTON TX
151	GARWOOD, TX	SOUTHWESTERN BELL	560 HOUSTON TX
152	GHOLSON, TX	SOUTHWESTERN BELL	556 WACO TX
153	GLENDALE, TX	SOUTHWESTERN BELL	552 DALLAS TX
154	GLENDALE EMS, TX	SOUTHWESTERN BELL	552 DALLAS TX
155	GOLDSMITH, TX	SOUTHWESTERN BELL	542 MIDLAND TX
156	GOLIAD, TX	SOUTHWESTERN BELL	564 CORPUS CHRISTI TX
157	GORDON, TX	SOUTHWESTERN BELL	552 DALLAS TX
158	GRAHAM, TX	SOUTHWESTERN BELL	548 WICHITA FALLS TX
159	GRANBURY, TX	SOUTHWESTERN BELL	552 DALLAS TX
160	GRANBURY EMS, TX	SOUTHWESTERN BELL	552 DALLAS TX

	WIRE CENTER	ILEC	LATA
161	GRAND PRAIRIE, TX	SOUTHWESTERN BELL	552 DALLAS TX
162	GRAND PRAIRIE EMS, TX	SOUTHWESTERN BELL	552 DALLAS TX
163	GRANDFALLS, TX	SOUTHWESTERN BELL	542 MIDLAND TX
164	GREENVILLE, TX	SOUTHWESTERN BELL	552 DALLAS TX
165	GREENVILLE EMS, TX	SOUTHWESTERN BELL	552 DALLAS TX
166	GRUVER, TX	SOUTHWESTERN BELL	546 AMARILLO TX
167	HALE VENTER, TX	SOUTHWESTERN BELL	544 LUBBOCK TX
168	HALLETTSVILLE, TX	SOUTHWESTERN BELL	564 CORPUS CHRISTI TX
169	HALISBURG, TX	SOUTHWESTERN BELL	556 WACO TX
170	HAMLIN, TX	SOUTHWESTERN BELL	550 ABILENE TX
171	HARLINGEN, TX	SOUTHWESTERN BELL	568 BROWNSVILLE TX
172	HEARNE, TX	SOUTHWESTERN BELL	570 HEARNE TX
173	HEBBRONVILLE, TX	SOUTHWESTERN BELL	564 CORPUS CHRISTI TX
174	HEMPSTEAD, TX	SOUTHWESTERN BELL	560 HOUSTON TX
175	HENRIETTA, TX	SOUTHWESTERN BELL	548 WICHITA FALLS TX
176	HEREFORD, TX	SOUTHWESTERN BELL	546 AMARILLO TX
177	HERMLEIGH, TX	SOUTHWESTERN BELL	550 ABILENE TX
178	HILLSBORO, TX	SOUTHWESTERN BELL	556 WACO TX
179	HONDO, TX	SOUTHWESTERN BELL	566 SAN ANTONIO TX
180	HONDO EMS, TX	SOUTHWESTERN BELL	566 SAN ANTONIO TX
181	HONEY GROVE, TX	SOUTHWESTERN BELL	552 DALLAS TX
182	HOUSTON, TX	SOUTHWESTERN BELL	560 HOUSTON TX
183	HOUSTON SUBURBAN, TX	SOUTHWESTERN BELL	560 HOUSTON TX
184	HUNTSVILLE, TX	SOUTHWESTERN BELL	560 HOUSTON TX
185	IOWA PARK, TX	SOUTHWESTERN BELL	548 WICHITA FALLS TX
186	IRAAN, TX	SOUTHWESTERN BELL	542 MIDLAND TX
187	ITALY, TX	SOUTHWESTERN BELL	552 DALLAS TX
188	ITASCA, TX	SOUTHWESTERN BELL	556 WACO TX
189	JACKSBORO, TX	SOUTHWESTERN BELL	548 WICHITA FALLS TX
190	JASPER, TX	SOUTHWESTERN BELL	562 BEAUMONT TX
191	JEFFERSON, TX	SOUTHWESTERN BELL	554 LONGVIEW TX
192	JEWETT, TX	SOUTHWESTERN BELL	552 DALLAS TX
193	KARNES CITY - FALLS CITY, TX	SOUTHWESTERN BELL	566 SAN ANTONIO TX
194	KENEDY, TX	SOUTHWESTERN BELL	566 SAN ANTONIO TX
195	KENNEDALE, TX	SOUTHWESTERN BELL	552 DALLAS TX
196	KENNEDALE EMS, TX	SOUTHWESTERN BELL	552 DALLAS TX
197	KERMIT, TX	SOUTHWESTERN BELL	542 MIDLAND TX
198	KINGSVILLE, TX	SOUTHWESTERN BELL	564 CORPUS CHRISTI TX
199	KIRBYVILLE, TX	SOUTHWESTERN BELL	562 BEAUMONT TX
200	KOUNTZE, TX	SOUTHWESTERN BELL	562 BEAUMONT TX

	WIRE CENTER	ILEC	LATA
201	LA BELLE, TX	SOUTHWESTERN BELL	562 BEAUMONT TX
202	LA PORTE, TX	SOUTHWESTERN BELL	560 HOUSTON TX
203	LA PRYOR, TX	SOUTHWESTERN BELL	566 SAN ANTONIO TX
204	LACOSTE, TX	SOUTHWESTERN BELL	566 SAN ANTONIO TX
205	LACOSTE EMS, TX	SOUTHWESTERN BELL	566 SAN ANTONIO TX
206	LADONIA, TX	SOUTHWESTERN BELL	552 DALLAS TX
207	LAMPASAS, TX	SOUTHWESTERN BELL	558 AUSTIN TX
208	LANGHAM CREEK, TX	SOUTHWESTERN BELL	560 HOUSTON TX
209	LAREDO, TX	SOUTHWESTERN BELL	566 SAN ANTONIO TX
210	LEANDER, TX	SOUTHWESTERN BELL	558 AUSTIN TX
211	LEFORS, TX	SOUTHWESTERN BELL	546 AMARILLO TX
212	LEROY, TX	SOUTHWESTERN BELL	556 WACO TX
213	LIBERTY, TX	SOUTHWESTERN BELL	560 HOUSTON TX
214	LIBERTY HILL, TX	SOUTHWESTERN BELL	558 AUSTIN TX
215	LIBERTY HILL EACS, TX	SOUTHWESTERN BELL	558 AUSTIN TX
216	LINDALE SWAN, TX	SOUTHWESTERN BELL	554 LONGVIEW TX
217	LIVERPOOL, TX	SOUTHWESTERN BELL	560 HOUSTON TX
218	LIVERPOOL EMS, TX	SOUTHWESTERN BELL	560 HOUSTON TX
219	LOCKHART, TX	SOUTHWESTERN BELL	558 AUSTIN TX
220	LOCKHART EMS, TX	SOUTHWESTERN BELL	558 AUSTIN TX
221	LOCKNEY, TX	SOUTHWESTERN BELL	544 LUBBOCK TX
222	LONGVIEW, TX	SOUTHWESTERN BELL	554 LONGVIEW TX
223	LORENA, TX	SOUTHWESTERN BELL	556 WACO TX
224	LOS FRESNO, TX	SOUTHWESTERN BELL	568 BROWNSVILLE TX
225	LUBBOCK, TX	SOUTHWESTERN BELL	544 LUBBOCK TX
226	LULING, TX	SOUTHWESTERN BELL	566 SAN ANTONIO TX
227	LUMBERTON, TX	SOUTHWESTERN BELL	562 BEAUMONT TX
228	LYTLE, TX	SOUTHWESTERN BELL	566 SAN ANTONIO TX
229	LYTLE EMS, TX	SOUTHWESTERN BELL	566 SAN ANTONIO TX
230	MADISONVILLE, TX	SOUTHWESTERN BELL	560 HOUSTON TX
231	MANSFIELD, TX	SOUTHWESTERN BELL	552 DALLAS TX
232	MANSFIELD EMS, TX	SOUTHWESTERN BELL	552 DALLAS TX
233	MANVEL, TX	SOUTHWESTERN BELL	560 HOUSTON TX
234	MARATHON, TX	SOUTHWESTERN BELL	542 MIDLAND TX
235	MARFA, TX	SOUTHWESTERN BELL	542 MIDLAND TX
236	MARION, TX	SOUTHWESTERN BELL	566 SAN ANTONIO TX
237	MARION EMS, TX	SOUTHWESTERN BELL	566 SAN ANTONIO TX
238	MARLIN, TX	SOUTHWESTERN BELL	556 WACO TX
239	MARLIN EACS, TX	SOUTHWESTERN BELL	556 WACO TX
240	MARSHALL, TX	SOUTHWESTERN BELL	554 LONGVIEW TX

	WIRE CENTER	ILEC	LATA
241	MART, TX	SOUTHWESTERN BELL	556 WACO TX
242	MATAGORDA, TX	SOUTHWESTERN BELL	560 HOUSTON TX
243	MATHIS, TX	SOUTHWESTERN BELL	564 CORPUS CHRISTI TX
244	MAURICEVILLE, TX	SOUTHWESTERN BELL	562 BEAUMONT TX
245	MCALLEN, TX	SOUTHWESTERN BELL	568 BROWNSVILLE TX
246	MCCAMEY, TX	SOUTHWESTERN BELL	542 MIDLAND TX
247	MCGREGOR, TX	SOUTHWESTERN BELL	556 WACO TX
248	MCKINNEY, TX	SOUTHWESTERN BELL	552 DALLAS TX
249	MCKENNEY EMS, TX	SOUTHWESTERN BELL	552 DALLAS TX
250	MCLEAN, TX	SOUTHWESTERN BELL	546 AMARILLO TX
251	MEDINA LAKE, TX	SOUTHWESTERN BELL	566 SAN ANTONIO TX
252	MEDINA LAKE EMS, TX	SOUTHWESTERN BELL	566 SAN ANTONIO TX
253	MERCEDES, TX	SOUTHWESTERN BELL	568 BROWNSVILLE TX
254	MERIDIAN, TX	SOUTHWESTERN BELL	556 WACO TX
255	MEXIA, TX	SOUTHWESTERN BELL	556 WACO TX
256	MIDKIFF, TX	SOUTHWESTERN BELL	542 MIDLAND TX
257	MIDLAND, TX	SOUTHWESTERN BELL	542 MIDLAND TX
258	MIDLAND EACS, TX	SOUTHWESTERN BELL	542 MIDLAND TX
259	MIDLOTHIAN, TX	SOUTHWESTERN BELL	552 DALLAS TX
260	MIDLOTHIAN EMS, TX	SOUTHWESTERN BELL	552 DALLAS TX
261	MINEOLA, TX	SOUTHWESTERN BELL	554 LONGVIEW TX
262	MINERAL WELLS, TX	SOUTHWESTERN BELL	552 DALLAS TX
263	MISSION, TX	SOUTHWESTERN BELL	568 BROWNSVILLE TX
264	MONAHANS, TX	SOUTHWESTERN BELL	542 MIDLAND TX
265	MOODY, TX	SOUTHWESTERN BELL	556 WACO TX
266	MOULTON, TX	SOUTHWESTERN BELL	564 CORPUS CHRISTI TX
267	MOUNT PLEASANT, TX	SOUTHWESTERN BELL	554 LONGVIEW TX
268	NACOGDOCHES, TX	SOUTHWESTERN BELL	560 HOUSTON TX
269	NEDERLAND-PORT NECHES, TX	SOUTHWESTERN BELL	562 BEAUMONT TX
270	NEW BRAUNFELS, TX	SOUTHWESTERN BELL	566 SAN ANTONIO TX
271	NEW BRAUNFELS EMS, TX	SOUTHWESTERN BELL	566 SAN ANTONIO TX
272	NORDHEIM, TX	SOUTHWESTERN BELL	564 CORPUS CHRISTI TX
273	NORTH RICHLAND HILLS, TX	SOUTHWESTERN BELL	552 DALLAS TX
274	NORTH RICHLAND HILLS EMS, TX	SOUTHWESTERN BELL	552 DALLAS TX
275	ODESSA, TX	SOUTHWESTERN BELL	542 MIDLAND TX
276	ODESSA EACS, TX	SOUTHWESTERN BELL	542 MIDLAND TX
277	OGLESBY, TX	SOUTHWESTERN BELL	556 WACO TX
278	OGLESBY EACS, TX	SOUTHWESTERN BELL	556 WACO TX
279	OMAHA, TX	SOUTHWESTERN BELL	554 LONGVIEW TX
280	ORANGE, TX	SOUTHWESTERN BELL	562 BEAUMONT TX

	WIRE CENTER	ILEC	LATA
281	OWENTOWN, TX	SOUTHWESTERN BELL	554 LONGVIEW TX
282	PADRE ISLAND, TX	SOUTHWESTERN BELL	564 CORPUS CHRISTI TX
283	PAMPA, TX	SOUTHWESTERN BELL	546 AMARILLO TX
284	PARIS, TX	SOUTHWESTERN BELL	552 DALLAS TX
285	PEARSALL, TX	SOUTHWESTERN BELL	566 SAN ANTONIO TX
286	PHARR, TX	SOUTHWESTERN BELL	568 BROWNSVILLE TX
287	PINEHURST, TX	SOUTHWESTERN BELL	560 HOUSTON TX
288	PINEHURST EMS, TX	SOUTHWESTERN BELL	560 HOUSTON TX
289	PIPE CREEK, TX	SOUTHWESTERN BELL	566 SAN ANTONIO TX
290	PIPE CREEK EMS, TX	SOUTHWESTERN BELL	566 SAN ANTONIO TX
291	PITTSBURG, TX	SOUTHWESTERN BELL	554 LONGVIEW TX
292	PLAINVIEW, TX	SOUTHWESTERN BELL	544 LUBBOCK TX
293	PLEASANTON, TX	SOUTHWESTERN BELL	566 SAN ANTONIO TX
294	PLEASANTON EMS, TX	SOUTHWESTERN BELL	566 SAN ANTONIO TX
295	PORT ARTHUR, TX	SOUTHWESTERN BELL	562 BEAUMONT TX
296	PORT BOLIVAR, TX	SOUTHWESTERN BELL	560 HOUSTON TX
297	PORT ISABEL, TX	SOUTHWESTERN BELL	568 BROWNSVILLE TX
298	POTEET, TX	SOUTHWESTERN BELL	566 SAN ANTONIO TX
299	POTEET EMS, TX	SOUTHWESTERN BELL	566 SAN ANTONIO TX
300	POTTSBORO, TX	SOUTHWESTERN BELL	552 DALLAS TX
301	PRAIRIE VIEW, TX	SOUTHWESTERN BELL	560 HOUSTON TX
302	PRINCETON, TX	SOUTHWESTERN BELL	552 DALLAS TX
303	PRINCETON EMS, TX	SOUTHWESTERN BELL	552 DALLAS TX
304	PROSPER, TX	SOUTHWESTERN BELL	552 DALLAS TX
305	PROSPER EMS, TX	SOUTHWESTERN BELL	552 DALLAS TX
306	PYOTE, TX	SOUTHWESTERN BELL	542 MIDLAND TX
307	QUANAH, TX	SOUTHWESTERN BELL	548 WICHITA FALLS TX
308	RANGER, TX	SOUTHWESTERN BELL	552 DALLAS TX
309	RANKIN, TX	SOUTHWESTERN BELL	542 MIDLAND TX
310	REAGAN, TX	SOUTHWESTERN BELL	556 WACO TX
311	RED OAK, TX	SOUTHWESTERN BELL	552 DALLAS TX
312	RED OAK (OVILLA), TX	SOUTHWESTERN BELL	552 DALLAS-TX
313	RED OAK EMS, TX	SOUTHWESTERN BELL	552 DALLAS TX
314	REFUGIO, TX	SOUTHWESTERN BELL	564 CORPUS CHRISTI TX
315	RICHMOND-ROSENBERG, TX	SOUTHWESTERN BELL	560 HOUSTON TX
316	RICHMOND-ROSENBERG EMS, TX	SOUTHWESTERN BELL	560 HOUSTON TX
317	RIO HONDO, TX	SOUTHWESTERN BELL	568 BROWNSVILLE TX
318	ROANOKE, TX	SOUTHWESTERN BELL	552 DALLAS TX
319	ROANOKE EMS, TX	SOUTHWESTERN BELL	552 DALLAS TX
320	ROBY, TX	SOUTHWESTERN BELL	550 ABILENE TX

	WIRE CENTER	ILEC	LATA
321	ROCKDALE, TX	SOUTHWESTERN BELL	558 AUSTIN TX
322	ROCKPORT, TX	SOUTHWESTERN BELL	564 CORPUS CHRISTI TX
323	ROCKWALL, TX	SOUTHWESTERN BELL	552 DALLAS TX
324	ROCKWALL EACS, TX	SOUTHWESTERN BELL	552 DALLAS TX
325	ROSCOE, TX	SOUTHWESTERN BELL	550 ABILENE TX
326	ROSENTHAL, TX	SOUTHWESTERN BELL	556 WACO TX
327	ROTAN, TX	SOUTHWESTERN BELL	550 ABILENE TX
328	ROYSE CITY, TX	SOUTHWESTERN BELL	552 DALLAS TX
329	ROYSE CITY EMS, TX	SOUTHWESTERN BELL	552 DALLAS TX
330	RUNGE, TX	SOUTHWESTERN BELL	566 SAN ANTONIO TX
331	SABINAL, TX	SOUTHWESTERN BELL	566 SAN ANTONIO TX
332	SABINE PASS, TX	SOUTHWESTERN BELL	562 BEAUMONT TX
333	SAN ANTONIO, TX	SOUTHWESTERN BELL	566 SAN ANTONIO TX
334	SAN AUGUSTINE, TX	SOUTHWESTERN BELL	560 HOUSTON TX
335	SAN BENITO, TX	SOUTHWESTERN BELL	568 BROWNSVILLE TX
336	SAN DIEGO, TX	SOUTHWESTERN BELL	564 CORPUS CHRISTI TX
337	SATSUMA, TX	SOUTHWESTERN BELL	560 HOUSTON TX
338	SEABROOK, TX	SOUTHWESTERN BELL	560 HOUSTON TX
339	SEAGOVILLE, TX	SOUTHWESTERN BELL	552 DALLAS TX
340	SEALY, TX	SOUTHWESTERN BELL	560 HOUSTON TX
341	SEGUIN, TX	SOUTHWESTERN BELL	566 SAN ANTONIO TX
342	SEGUIN EMS, TX	SOUTHWESTERN BELL	566 SAN ANTONIO TX
343	SEMINOLE, TX	SOUTHWESTERN BELL	542 MIDLAND TX
344	SHAMROCK, TX	SOUTHWESTERN BELL	546 AMARILLO TX
345	SHELDON, TX	SOUTHWESTERN BELL	560 HOUSTON TX
346	SHINER, TX	SOUTHWESTERN BELL	564 CORPUS CHRISTI TX
347	SILSBEE, TX	SOUTHWESTERN BELL	562 BEAUMONT TX
348	SINTON, TX	SOUTHWESTERN BELL	564 CORPUS CHRISTI TX
349	SKELLYTOWN, TX	SOUTHWESTERN BELL	546 AMARILLO TX
350	SKIDMORE, TX	SOUTHWESTERN BELL	564 CORPUS CHRISTI TX
351	SLATON, TX	SOUTHWESTERN BELL	544 LUBBOCK TX
352	SMITHERS LAKE, TX	SOUTHWESTERN BELL	560 HOUSTON TX
353	SMITHERS LAKE EMS, TX	SOUTHWESTERN BELL	560 HOUSTON TX
354	SMITHVILLE, TX	SOUTHWESTERN BELL	558 AUSTIN TX
355	SMITHVILLE EMS, TX	SOUTHWESTERN BELL	558 AUSTIN TX
356	SNYDER, TX	SOUTHWESTERN BELL	550 ABILENE TX
357	SOUR LAKE, TX	SOUTHWESTERN BELL	562 BEAUMONT TX
358	SOUTH BOSQUE, TX	SOUTHWESTERN BELL	556 WACO TX
359	SOUTH VIDOR, TX	SOUTHWESTERN BELL	562 BEAUMONT TX
360	SPLENDORA, TX	SOUTHWESTERN BELL	560 HOUSTON TX

	WIRE CENTER	ILEC	LATA
361	SPLENDORA EMS, TX	SOUTHWESTERN BELL	560 HOUSTON TX
362	SPRING, TX	SOUTHWESTERN BELL	560 HOUSTON TX
363	SPRING EMS, TX	SOUTHWESTERN BELL	560 HOUSTON TX
364	SPURGER, TX	SOUTHWESTERN BELL	562 BEAUMONT TX
365	STAMFORD, TX	SOUTHWESTERN BELL	550 ABILENE TX
366	STANTON, TX	SOUTHWESTERN BELL	542 MIDLAND TX
367	STINNETT, TX	SOUTHWESTERN BELL	546 AMARILLO TX
368	STRAWN, TX	SOUTHWESTERN BELL	552 DALLAS TX
369	SULLIVAN CITY, TX	SOUTHWESTERN BELL	568 BROWNSVILLE TX
370	SWEETWATER, TX	SOUTHWESTERN BELL	550 ABILENE TX
371	TAYLOR, TX	SOUTHWESTERN BELL	558 AUSTIN TX
372	TAYLOR EMS, TX	SOUTHWESTERN BELL	558 AUSTIN TX
373	TEAGUE, TX	SOUTHWESTERN BELL	556 WACO TX
374	TEMPLE, TX	SOUTHWESTERN BELL	556 WACO TX
375	TERMINAL, TX	SOUTHWESTERN BELL	542 MIDLAND TX
376	TERMINAL 640, TX	SOUTHWESTERN BELL	542 MIDLAND TX
377	TERRELL, TX	SOUTHWESTERN BELL	552 DALLAS TX
378	TERRELL EMS, TX	SOUTHWESTERN BELL	552 DALLAS TX
379	TEXAS CITY-LA MARQUE, TX	SOUTHWESTERN BELL	560 HOUSTON TX
380	TIMPSON, TX	SOUTHWESTERN BELL	560 HOUSTON TX
381	TOMBALL, TX	SOUTHWESTERN BELL	560 HOUSTON TX
382	TOMBALL EMS, TX	SOUTHWESTERN BELL	560 HOUSTON TX
383	TROY, TX	SOUTHWESTERN BELL	556 WACO TX
384	TYLER, TX	SOUTHWESTERN BELL	554 LONGVIEW TX
385	UVALDE, TX	SOUTHWESTERN BELL	566 SAN ANTONIO TX
386	VALLEY LODGE, TX	SOUTHWESTERN BELL	560 HOUSTON TX
387	VALLEY LODGE EMS, TX	SOUTHWESTERN BELL	560 HOUSTON TX
388	VERNON, TX	SOUTHWESTERN BELL	548 WICHITA FALLS TX
389	VICTORIA, TX	SOUTHWESTERN BELL	564 CORPUS CHRISTI TX
390	VIDOR, TX	SOUTHWESTERN BELL	562 BEAUMONT TX
391	VINTON, TX	SOUTHWESTERN BELL	540 EL PASO TX
392	WACO, TX	SOUTHWESTERN BELL	556 WACO TX
393	WALLER, TX	SOUTHWESTERN BELL	560 HOUSTON TX
394	WALLER EMS, TX	SOUTHWESTERN BELL	560 HOUSTON TX
395	WARREN, TX	SOUTHWESTERN BELL	562 BEAUMONT TX
396	WAXAHACHIE, TX	SOUTHWESTERN BELL	552 DALLAS TX
397	WAXAHACHIE EMS, TX	SOUTHWESTERN BELL	552 DALLAS TX
398	WEATHERFORD, TX	SOUTHWESTERN BELL	552 DALLAS TX
399	WEATHERFORD EMS, TX	SOUTHWESTERN BELL	552 DALLAS TX
400	WEST, TX	SOUTHWESTERN BELL	556 WACO TX

	WIRE CENTER	ILEC	LATA
401	WESTBROOK, TX	SOUTHWESTERN BELL	550 ABILENE TX
402	WESTBURY, TX	SOUTHWESTERN BELL	562 BEAUMONT TX
403	WESTFIELD, TX	SOUTHWESTERN BELL	560 HOUSTON TX
404	WESTFIELD EMS, TX	SOUTHWESTERN BELL	560 HOUSTON TX
405	WHARTON, TX	SOUTHWESTERN BELL	560 HOUSTON TX
406	WICHITA FALLS, TX	SOUTHWESTERN BELL	548 WICHITA FALLS TX
407	WILDWOOD, TX	SOUTHWESTERN BELL	562 BEAUMONT TX
408	WILLS POINT, TX	SOUTHWESTERN BELL	552 DALLAS TX
409	WINK, TX	SOUTHWESTERN BELL	542 MIDLAND TX
410	WOLFE CITY, TX	SOUTHWESTERN BELL	552 DALLAS TX
411	WOODSBORO, TX	SOUTHWESTERN BELL	564 CORPUS CHRISTI TX
412	WOODVILLE, TX	SOUTHWESTERN BELL	562 BEAUMONT TX
413	WORTHAM, TX	SOUTHWESTERN BELL	556 WACO TX
414	YOAKUM, TX	SOUTHWESTERN BELL	564 CORPUS CHRISTI TX
415	YOAKUM EACS, TX	SOUTHWESTERN BELL	564 CORPUS CHRISTI TX
416	YORKTOWN, TX	SOUTHWESTERN BELL	564 CORPUS CHRISTI TX
417	ZAPATA, TX	SOUTHWESTERN BELL	568 BROWNSVILLE TX

Attachment 2



Meet the new kid on the block.

IPC is the Communications carrier that cares.

LIFELINE PLANS

\$9.95

/Month + Tax

Package: Plain

Features: No Features

\$17.95

/Month + Tax

Package: Lifeline Basic

Features: Call Waiting, Caller ID, & Toll Restrictions

\$23.75**

/Month + Tax

Package: Lifeline Basic Plus

Features: Call Waiting, Caller ID, Toll Restrictions, & 200 Long Distance Minutes

NON-LIFELINE PLANS

\$23.75

/Month + Tax

Package: Plain

Features: No Features

\$32.95

/Month + Tax

Package: Basic

Features: Call Waiting, Caller ID, & Toll Restrictions

\$40.95

/Month + Tax

Package: Basic Plus

Features: Call Waiting, Caller ID, Toll Restrictions, & 200 Long Distance Minutes

DSL PLANS

\$44.95*

/Month + Tax

Package: Plain

Features: Up To 3 MBPS

\$54.95*

/Month + Tax

Package: Basic

Features: Up To 5 MBPS

\$69.95*

/Month + Tax

Package: Basic Plus

Features: Up To 10 MBPS

DSL BUNDLE

Bundle Plans are available upon request only.
for more information contact one of our agents
or reps to get more information about the plans.

JOIN THE IPC FAMILY TODAY.

NO CONTRACTS*

NO CREDIT CHECKS

NO DEPOSIT

PLANS STARTING AS LOW AS

\$9.95/MONTH

24/7 LIVE CUSTOMER SERVICE

A PHONE GIVES YOU THE ABILITY TO TALK.
IPC GIVES YOU THE ABILITY TO COMMUNICATE.

Comprehensive terms and conditions apply for Integrated Path Communications, LLC ("IPC"). Lifeline Program are available at www.ipc-llc.com. In addition to the terms and conditions on the applicable IPC Lifeline enrollment form, all standard terms and conditions of IPC service apply. IPC is a Lifeline service provider designated as an eligible telecommunications carrier and eligible telecommunications provider. Lifeline is a federal government-supported program that is only available for one landline or one wireless phone per household (not both). Only one lifeline discount may be received per household. Only eligible consumers may enroll in the program. Consumers who willfully make a false statement in order to obtain Lifeline benefit can be punished by fine or imprisonment or can be barred from the program. Customers must present proper documentation confirming eligibility for the Lifeline program through participation in Federal Public Housing Assistance, Food Stamps, Low-Income Home Energy Assistance Program (LIHEAP), Income below 135% of the Federal Poverty Guidelines, Medicaid, National School Lunch's Free Lunch Program, Supplemental Security Income (SSI), and Temporary Assistance to Needy Families (TANF). Proof of eligibility includes an eligible program card or statement of benefits. Plans and rates are subject to change without notice. Other restrictions may apply. ** Excepting Fort Hood residents who are charged a

APPLICANT CERTIFICATION

State of New York
County of New York

My name is Brian Shepard, I am employed by Integrated Path Communications, LLC, located at 9030 State Route 22 Suite 3 Hillsdale, NY 12529 as its President. I am an officer of the Company and am authorized to provide the following certifications on behalf of the Company. This certification is being given to support the wireline Eligible Telecommunications Carrier petition filed by my Company with the Florida Public Service Commission (PSC).

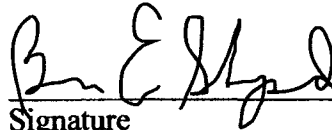
Company hereby certifies the following:

1. Company will follow all Florida Statutes, Florida Administrative Rules, and Florida PSC Orders relating to Universal Service, Eligible Telecommunications Carriers (ETC), and the Florida Lifeline Program.
2. Company will follow all FCC rules, FCC Orders, and regulations contained in the Telecommunications Act of 1996 regarding federal Universal Service Program.
3. Company agrees that the Florida PSC may revoke a carrier's ETC designation for good cause after notice and opportunity for hearing, for violations of any applicable Florida Statutes, Florida Administrative Rules, Florida PSC Orders, failure to fulfill requirements of Sections 214 or 254 of the Telecommunications Act of 1996, or if the PSC determines that it is no longer in the public interest for the company to retain ETC designation.
4. Company understands that if its petition for ETC designation is found to be in the public interest and approved by the PSC, it is based upon the information provided to the PSC in its petition. If there is a future change of company ownership, the company understands that the new owners must file a petition with the PSC prior to offering or getting USF or Lifeline, prior to the change of ownership and also make a showing of public interest to maintain the ETC designation.
5. Company understands that it may only receive reimbursement from the Universal Service Administrative Company (USAC) for active customer access lines which are provided using its own facilities or a combination of its own facilities and access lines obtained as UNEs from another carrier.
6. Company understands that the PSC shall have access to all books of account, records and property of all eligible telecommunications carriers. Company agrees to maintain records to document compliance with all federal and state requirements governing the Lifeline program for as long as the consumer receives Lifeline service plus five years.

7. Company understands that Lifeline certification forms must be signed by applicants confirming that they participate in a qualifying Lifeline-eligible program prior to that customer being enrolled in the Florida Lifeline program. If a Lifeline applicant uses income-based eligibility, the company will require documents showing proof of income before customer eligibility is granted.
8. Company agrees that it will not file a request for any low-income reimbursement at USAC without having customer-signed Lifeline certification applications on file at its office supporting amounts requested on USAC's Form 497.
9. Company agrees it will submit to the PSC a copy of Form 497s filed with USAC, and will make available supporting signed customer Lifeline certifications upon request to:

Florida Public Service Commission
Office of Telecommunications
2540 Shumard Oak Drive
Tallahassee, Florida 32399-0850
10. Company agrees that it will file a copy its annual reporting requirements for High-Cost support recipients pursuant to 47 C.F.R. 54.313 with the PSC.

I am aware that pursuant to Section 837.06, F.S., whoever knowingly makes a false statement in writing with the intent to mislead a public servant in the performance of his or her official duty shall be guilty of a misdemeanor of the second degree.



Signature

Brian Shepard

Printed Name

9/5/2016

Date

Business Address:

9030 State Route 22

Suite 3

Hillsdale, NY 12529