2013 Annual Report of the Colorado High Cost Support Mechanism

Prepared by:

The Colorado Public Utilities Commission Staff

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Department of Regulatory Agencies

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December 1, 2013

The General Assembly
State Capitol Building
Denver, Colorado 80203

Dear General Assembly Member:

The attached report on the Colorado High Cost Support Mechanism (CHCSM) for 2013 is hereby submitted to the House Economic and Business Development and the Senate Business, Labor and Technology Committee, in accordance with section 40-15-208, C.R.S. The proposed operations for calendar year 2014 are also included.

The Colorado High Cost Support Mechanism was created in House Bill 95-1335 to provide financial assistance to local exchange providers to help make basic local exchange service affordable and allow such providers to be fully reimbursed for the difference between the reasonable costs incurred in making basic service available to their customers within a rural, high cost geographic support area and the price charged for such service. This also considers any amounts received from the federal government.

Distributions from the High Cost Support Mechanism for calendar year 2013 are estimated to be approximately $52 million and contributions estimated at $54 million. Currently, customers are paying a 2.6 percent rate element. It may be possible to reduce the 2.6 percent rate element in subsequent quarters of 2014 and still meet the forecasted demand for CHCSM.

If I can be of further assistance to you, please let me know.

Sincerely,

Doug Dean

Doug Dean
Director

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I. Overview

The Telecommunications Act of 1996 established the framework for universal service. The expressed purpose of the Act is:

> . . . to make available, so far as possible, to all the people of the United States, without discrimination on the basis of race, color, religion, national origin, or sex, a rapid, efficient, Nation-wide, and world-wide wire and radio communication service with adequate facilities at reasonable charges. . . .[1]

The concept of universal service as a public policy goal means ubiquitous availability of a specified set of telecommunications services delivered at a specified level of quality and at an affordable price so that every household is reasonably able to connect to a telephone network.

The policy goal of universal telephone service is being supported through a number of explicit federal and state mandated mechanisms. Explicit mechanisms provide targeted support to specific geographic areas, companies, or households. These include:

- Lifeline Assistance - programs to assist qualifying low-income households by providing reduced monthly rates;
- Telecommunications Relay Services - to enable speech or hearing impaired individuals to use the voice telephone network;
- Rural Utilities Service Loans – low interest loans to support rural local exchange carriers' construction budgets; and
- Federal and State Universal Service Funds - to support local exchange carriers that provide service in high cost areas.

[1] Communications Act of 1934, Title I, Section 1 (47 U.S.C. 151).

The Colorado High Cost Support Mechanism (CHCSM) is under the administration of the Colorado Public Utilities Commission (Commission or PUC) pursuant to § 40-15-208, C.R.S., and implemented by the Commission's Rules Regulating Telecommunications Providers, Services, and Products found at 4 *Code of Colorado Regulations* (CCR) 723-2-2840 through 2856. The goal of the CHCSM is to promote and support universal service by helping to make basic local exchange service available and affordable within high cost areas of the state. The Commission has augmented and strengthened the CHCSM program through the issuance of regulation, rules, and other directives.

A local exchange carrier (LEC) must be designated as an Eligible Telecommunications Carrier (ETC) in order to receive Federal Universal Service Funds and be designated as an Eligible Provider (EP) and an ETC to receive funds from the CHCSM.

The CHCSM provides financial support to local exchange carriers who qualify as EPs so that basic local exchange service may be more affordable to consumers in certain areas where the cost to provide such service is high. The CHCSM disbursements paid to providers are coordinated with support received from other support mechanisms, such as the Federal Universal Service Fund (USF) program. That is, any federal High Cost Loop Support received by providers is considered an offset to the CHCSM if the provider allocates its costs between interstate and intrastate service.[2] This is to ensure that no provider receives funds from the CHCSM that, when combined with any other revenue sources, exceeds the cost of providing local exchange service.[3]

There are eleven local exchange carriers[4] that currently receive CHCSM support. Additionally, there are four wireless carriers[5] that have been granted EP status as well as one competitive local exchange carrier[6]. However, only two of these carriers, N.E. Colorado Cellular, Inc., doing business as Viaero (N.E. Colorado Cellular, NECC, or Viaero) and NNTC Wireless, currently receive CHCSM funds. Wiggins Telephone Association (Wiggins) filed a petition on July 1, 2011, seeking CHCSM support in

2 For "average schedule" companies, all federal revenues offset the total costs of the company.

3 § 40-15-208,(2)(a)(I) C.R.S.

4 Agate Mutual Telephone Company; Delta County Telecommunications, Inc.; Nucla-Naturita Telephone Company; Nunn Telephone Company; Peetz Co-op Telephone Company; Phillips County Telephone Company; Pine Drive Telephone Company; Qwest Corporation doing business as CenturyLink QC; Rico Telephone Company; Roggen Telephone Cooperative; and Willard Telephone Company.

5 Northeast Colorado Cellular, Inc., doing business as Viaero; Commnet Four Corners, LLC; Elbert County Wireless, LLC; and NNTC Wireless, LLC.

6 Northern Colorado Communications, Inc.

the amount of $137,610.[7] The Commission denied Wiggins petition seeking CHCSM support[8]. The Commission found, among other things, that Wiggins failed to perform a proper interstate-intrastate cost allocation study under 47 Code of Federal Regulations Part 36 (Part 36 study), and that it lacked up-to-date continuing property records (CPRs).

On November 15, 2012, Northern Colorado Communications, Inc. (NCCI) filed its application for designation as an Eligible Telecommunications Carrier (ETC) and as an Eligible Provider (EP) in the State of Colorado. NCCI is a wholly-owned subsidiary of Wiggins and is a competitive local exchange carrier. The requested designation was limited to the Weldona exchange in northern Colorado. NCCI was seeking identical support funding in accordance with Commission Rule 2847(g) and 2848(c). NCCI was granted ETC and EP status in the Weldona exchange to receive CHCSM funding on May 28, 2013[9].

On January 4, 2013, Uintah Basin Electronics, doing business as Strata Networks, filed an application for designation as an ETC to bid competitively in future auctions, specifically the Connect America Fund (CAF) Mobility Fund Phase II auction. Strata was granted ETC designation on July 16, 2013[10]. Strata will not be receiving funds from the CHCSM.

Fifteen wireless carriers have received ETC designation in order to be eligible for receipt of federal high cost Lifeline support and will not be receiving funds from the CHCSM.

An average of 110 carriers contributed to the CHCSM fund in 2013, down from 115 carriers contributing in 2012. The estimated total contribution amount is $54,319,024. An estimated amount of $52,163,133 will be distributed by year-end 2013. The Colorado universal service rate element on customer bills is currently 2.6 percent. It is anticipated the rate element will remain at 2.6 percent based on current trends for fund disbursements and contributions through the 1st QRT 2014, but may be adjusted accordingly to maintain the fund’s 20% target reserve balance necessary to maintain the cash flow and other administrative expenses.

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[7] *See* Proceeding No. 11V-594T.
[8] *See* Decision R13-0157, C13-0876 and C13-0529.
[9] *See* Proceeding No. 12A-1186T, Decision No. R13-0634 and Decision No. C13-0902
[10] *See* Proceeding No. 13A-0020T, Decision No. R13-0877

The Commission adopted emergency rules in Decision No. C12-0179, Proceeding No. 12R-148T, as a result of enactments made in the Federal Communications Report and Order and Notice of Proposed Rulemaking, issued November 18, 2011[11]. The emergency rules capped the CHCSM fund at $54,000,000 or $13,500,000 per quarter at paragraph 2843(c), and required an application under extraordinary circumstances for initial or resetting of HCSM support at rule 2856. The rules expired September 18, 2012, however, Decision No. C12-1442 in Proceeding No. 12R-862T (discussed below) made permanent the annual cap of $54,000,000 but declined to adopt the quarterly cap and the extraordinary circumstances for initial or resetting of HCSM support at rules 2856. The Commission also adopted revisions that capped switched access charges by rate element.

On August 1, 2012, the Commission opened Proceeding No. 12R-862T, commencing a three-phase approach to update and reform Rules 4 CCR, 723-2. The goal is to achieve reduced regulation where appropriate, including appropriate reductions to the CHCSM, and to clean-up and modernize the telecommunications rules. In addition to the first phase, outlined in the subsequent paragraph, in the second phase the Commission opened an adjudicatory proceeding to determine the specific areas of the state are subject to effective competition for basic local service.

The proposed amended rules in phase I set forth a regulatory framework for determining the existence of effectively competitive areas, the elimination of funding from the CHCSM in effectively competitive areas, address limited regulatory treatment of IP-enabled and Interconnected VoIP services, and make permanent certain previous emergency rules set forth in Rule 2202, 2203, 2843, and 2856. Comments were filed by parties in the Proceeding on August 29, 2012 and Reply Comments filed on September 19, 2012. The Commission held hearings on the matter on October 1, 2 and 3, 2012. Statements of Position were filed October 26, 2012 and the Commission held deliberations on November 20, 2012. Decision No. C12-1442 issued December 17, 2012, with an effective date of December 24, adopted certain Rules Regulating Telecommunications Providers, Services, and Products, 4 *Code of Colorado Regulations* (CCR), 723-2, that were proposed with the basis and purpose of setting forth a regulatory framework for determining the existence of effective competition

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11 *See Report and Order and Further Notice of Proposed Rulemaking*, WC Proceeding No. 10-90, GN Docket No. 09-51, et. al. Order No. 11-161 (rel. November 18, 2011).

areas (ECA) for basic services; setting a relaxed regulatory scheme for ECAs and making permanent certain emergency rules as discussed above. The Commission also affirmed the status quo of not placing regulatory barriers on IP enabled services and continue to exercise authority to ensure high quality basic emergency services and require contributions to vital state support funds from carriers on a technologically-neutral basis. With these rules the Commission is reducing regulatory requirements where effective competition exists and continuing to provide high cost support in rural, underserved areas. The new rules also allow for any provider receiving HCSM support to file an application for continued support in an area deemed an ECA. Therefore, both the underlying carrier and the competitive EP are eligible to file an application. To continue to receive HCSM support, a carrier must file on its own behalf.

In Proceeding No. 13M-0422T, Decision No. C13-0522, the Commission, on its own motion, initiated the adjudicatory process to determine which areas in Colorado may be classified as ECAs. The Commission found that it was appropriate to prioritize wire centers, and found that wire center serving areas where data indicate the presence of the underlying provider, CenturyLink, and three or more facilities based providers, will be the basis of the initial review. This proceeding is in progress.

On July 31, 2013 the Commission adopted Decision No. C13-0958 in Proceeding No. 13M-0877T on its own motion to review rules regarding the Colorado High Cost Support Mechanism (HCSM) and funding in ECA's. Proposed rules for funding in areas of ECAs are expected sometime at end of 1st QTR 2014. The review of CHCSM rules plus costing and pricing rules will commence in 2 QTR 2014. In this proceeding, the Commission intends to investigate the necessary legal and policy direction for HCSM adjudications and promoting consistency across all providers in areas of the state.

In 2013, two bills were introduced in the legislature regarding telecom reform. Neither bill was passed. Senate Bill13-287 was introduced April 29, 2013 and would have exempted VoIP service and internet protocol service from regulation by the PUC and exempt broadband service from state sales tax. The bill also would have added broadband internet service in unserved and underserved areas to the services that are reimbursable from the CHCSM. In addition, it would have exempted basic local exchange service from regulation in areas in which the PUC has determined that effective competition exists. The bill was laid over to May 10, 2013. House Bill13-1255 was introduced on March 6, 2013 and if enacted would have clarified that certain internet protocol-enabled service, including VoIP, would have been exempt from regulation. It was postponed indefinitely on May 8, 2013.

II. History

The Commission adopted its first explicit HCSM in 1990. The Commission adopted rules that prescribed procedures for separating telecommunications costs, revenues, expenses, and reserves for access charges for LECs and established the Colorado High Cost Fund (CHCF). As discussed in more detail below, the CHCF was later renamed the CHCSM along with other minor modifications.

Senate Bill (SB) 92-16 was enacted on April 16, 1992, amending Article 15 of Title 40, Colorado Revised Statutes, by the addition of a new section, § 40-15-208, C.R.S. The new section codified the creation of the CHCF and authorized the Commission administration of the fund. To provide direct oversight of activities and performance of the CHCF, the Commission implemented rules, now found at 4 CCR 723-2-2840 through 2855.

On May 24, 1995, House Bill (HB) 95-1335 (Colorado Act) was enacted. The Colorado Act, in part, modified the statutory definition of Basic Service, amended the section establishing the CHCSM, and added a new Part 5 to Article 15 of Title 40, providing for local exchange service competition.

The Colorado Act gave an expression of state policy that:

> The commission shall require the furtherance of universal basic service, toward the ultimate goal that basic service be available and affordable to all citizens of the state of Colorado. . . The commission shall have the authority to regulate providers of telecommunications services to the extent necessary to assure that universal basic service is provided to all consumers in the state at fair, just, and reasonable rates. § 40-15-502(3), C.R.S.

The Commission was given further instruction by the expression of state policy that:

> In order to accomplish the goals of universal basic service . . . the commission shall create a system of support mechanisms to assist in the provision of such services in high cost areas. These support mechanisms shall be funded equitably and on a non-discriminatory, competitively neutral basis through assessments on all telecommunications service providers in Colorado . . . . § 40-15-502(5), C.R.S.

The bill modified the high cost support mechanism portion of the law, § 40-15-208, C.R.S., to ensure that all providers of basic local exchange service in high cost areas are reimbursed for the difference between the costs incurred in making basic service available to customers within a rural high cost geographic support area and the affordable price for such service.

The Commission adopted specific rules implementing these statutory guidelines. The Commission conducted rulemaking in Proceeding Nos. 95R-558T and 97R-043T regarding the CHCSM. Non-rural incumbent telecom providers are currently regulated by Commission rules requiring cost estimates based on a proxy cost model estimate. These proxy cost estimates are then compared to a revenue benchmark with the resulting differential funded by the CHCSM for EPs. Rural incumbent telecommunications providers are currently regulated by Commission rules requiring cost estimates based on the actual embedded cost of service demonstration net of relevant revenues. The CHCSM is funded by a customer surcharge on intrastate retail revenues from telecommunications services. The Commission requires telecommunications service providers to collect and remit the surcharge based on its end-user intrastate telecommunications service revenues. Incumbent EPs that receive support are net recipients from the CHCSM.

In 1998, Qwest Corporation (Qwest) entered into a Stipulation and Settlement Agreement with the Commission freezing the annual support for Qwest until a sufficient proxy model could be developed. In 2002, the parties in Proceeding No. 98M-147T (Regarding the Administration of the Colorado High Cost Fund and the Adoption of a Proxy Cost Model) met and agreed to use the results produced by the FCC's Hybrid Cost Proxy Model (HCPM) to establish wire-center specific cost support for Qwest for calendar year 2003. On August 1, 2003, upon Qwest's receipt of increased high cost support from the implementation of the Commission's Order granting it support for all lines, Qwest eliminated zone charges outside its base serving area for over 225,000 of its Colorado telephone lines. The elimination of Qwest zone charges reduced some residential rates by as much as $20.00 per line per month and some business rates by as much as $25.00 per line per month.

On May 18, 1998, SB 98-177 was enacted which further modified § 40-15-208(2)(d)(I), C.R.S., by changing the name of the program to the "Colorado High Cost Support Mechanism," and required that the CHCSM not exceed $60 million during each of the calendar years 1998 and 1999. Further, SB 98-

177 required that a report be prepared by the Commission accounting for the operation of the high cost support mechanism, and that the report be submitted to the General Assembly on or before December 1 of each year. The Commission adopted interim rules[12] and, subsequently, permanent rules[13] implementing SB 98-177.

During 1999, in conjunction with the proceeding conducted by the Commission to review the definition of Basic Local Exchange Service as required by § 40-15-502(2), C.R.S., the Commission further addressed CHCSM rule issues. The Commission reiterated its decision to support only the primary residential line and the first business line in non-rural high cost areas, and on an interim basis to continue support to all access lines in rural high cost areas.

In 2003, the Commission adopted Rule 4 CCR 723-41-9.2.3 (recodified 4 CCR 723-2-2848(d)(II), effective April 1, 2006), which extended CHCSM support to all residential and business lines to non-rural providers in this state.

In 2004, the Commission continued its investigation into the adoption of the high cost proxy model (Proceeding No. 98M-147T). The Commission approved the use of results from the FCC's HCPM, with modifications made to accommodate the specific needs of Colorado telecommunications providers, and to provide wire center-specific cost support to Qwest. The Commission approved a Stipulation which used average monthly costs per line produced from the HAI Consulting, Inc. (HAI) 5.2 model, including Staff adjustments made in Proceeding No. 99A-577T, Qwest's updated 2003 Automated Reporting Management Information System (ARMIS) data, and updates to the model's line count information. Use of this methodology resulted in CHCSM funding to Qwest in the amount of $58,386,874 for the calendar year 2005. Following this Stipulation, Proceeding No. 98M-147T was closed and a new proceeding was opened to consider future cost methodologies. Proceeding No. 04M-388T was opened and is ongoing to consider further development of Proxy Cost Models used to establish Qwest's yearly CHCSM draw.

In 2005, N.E. Colorado Cellular became the first wireless carrier to begin drawing CHCSM support.

[12] *See* PUC Proceeding No. 98R-334T.
[13] *See* PUC Proceeding No. 99R-028T.

N.E. Colorado Cellular is eligible to receive CHCSM support on a per line basis, based on the amount the underlying incumbent carrier receives in support for that wire center and on the number of N.E. Colorado Cellular lines.

In 2005, the Commission opened an investigatory proceeding (05I-431T) for the purpose of examining the CHCSM process. Seven workshops were conducted where parties discussed in detail their views on issues. An Administrative Law Judge that attended the workshops issued a report to the Commission that outlined the discussions that took place during the workshops.

During its regular 2005 session, the Colorado General Assembly enacted HB 05-1203 which became effective on July 1, 2005. This bill added two clarifying definitions to the statutes:

> a) "Distributed Equitably" to mean a distribution of funds that is accomplished using regulatory principles that are neutral in their effect, that do not favor one class of providers over another, and do not cause any eligible rural telecommunications provider to experience a reduction in its high cost support mechanism requirement based on commission rules that are not applicable to other telecommunications providers.
>
> b) "Non-discriminatory and competitively neutral basis" refers to distributions that are made by the commission shall be made using regulatory principles that are neutral in their effect, do not favor one class of providers over another, and do not impose regulatory requirements or costs on only one class of customers.

The Commission adopted emergency rules in Proceeding No. 05R-381T in response to the passage of HB 05-1203. The Commission took this emergency action to ensure that high cost support be made in a nondiscriminatory manner and that regulatory requirements are not imposed on one set of carriers without having them imposed on all. The emergency rules eliminated the provision for rural carriers which would phase-down CHCSM support over a seven-year period, from 100 percent in the first and second year, to zero during the seventh year.

The Commission adopted permanent rules[14] to address the implementation of the new statutory language the Colorado General Assembly enacted in HB 05-1203 in 2006. The purpose of the legislation was to eliminate any inequitable treatment in the distribution of CHCSM support and to ensure that the CHCSM be implemented in a manner that is nondiscriminatory and on a competitively

[14] *See* Proceeding No. 05R-529T.

neutral basis. The rules adopted eliminated the long standing practice of applying a general rate case filing process to establish earning requirements as the basis for setting the initial or increased CHCSM draw. Going forward, the initial level of support and any increases in support are determined using streamlined data and analysis requirements as set forth by the Commission's Decision No. C07-0919 issued in Proceeding No. 07M-124T on November 9, 2007.

Additionally, under the new rules once the CHCSM support amount is set, the petitioning company will continue to receive the support each year unless modified by the Commission or the company requests a modification. A simple single page form was created and implemented that incorporates available provider information for the purpose of monitoring the earnings of these rate-of-return regulated companies once support is established. Should a concern arise, or indications that an over-earnings situation may exist, Staff may initiate a formal complaint and bring this matter before the Commission. After an opportunity for hearing on any formal complaint, the outcome of this proceeding could result in the re-setting of CHCSM support for a provider.

In February 2006, the Commission opened an investigatory proceeding (Proceeding No. 06I-084T) to consider the revision of the definition of basic local exchange telephone service (basic service). The proceeding was opened to satisfy the provision of § 40-15-502(2), C.R.S., requiring the Commission to conduct a proceeding no less frequently than every three years to consider any revision to the definition of basic service. The Commission found that the existing definition of basic local exchange telephone service continued to meet the goal of maintaining the affordability and quality of basic local exchange service.

In June 2006, the FCC issued an order (No. FCC 06-94 Report and Order and NPRM) in its IP Enabled Services and Universal Service Fund dockets that established universal service contribution obligations for providers of interconnected VoIP. While the FCC acknowledged VoIP as a mixed use service (*i.e.*, interstate and intrastate) and concluded that VoIP providers are telecommunications providers,[15] the FCC has not yet defined VoIP as a telecommunications service or an information service. The FCC has declared that interconnected VoIP providers have three options to determine their interstate revenues for which they can assess the USF rate: 1) they may use the interim safe harbor provision

[15] *See* Report and Order and Notice of Proposed Rulemaking, FCC 06-94, released June 27, 2006.

established by the FCC at 64.9 percent interstate; 2) they may report their actual interstate telecommunications revenues; or 3) they may rely on traffic studies to allocate interstate revenues. In this same order the FCC raised the interim safe harbor percentage for USF contributions from 28.5 percent to 37.1 percent for wireless providers.

In 2008, the Commission opened a rulemaking proceeding to comprehensively examine the CHCSM rules prescribing the implementation of CHCSM. Proceeding No. 08R-476T was terminated in 2009 by operation of law due to rules not being adopted within 180 days after the last public hearing in the matter. Proceeding No. 10R-191T was opened in April 2010 with proposed changes to existing rules to accommodate new regulatory schemes, changes in the federal USF program, and recent proceedings that have directly impacted the HCSM rules. Changes to the existing rules will be implemented January 1, 2012 which have been previously summarized.

In July 2009, the Commission opened an investigatory proceeding (Proceeding No. 09I-493T) to consider the revision of the definition of basic local exchange telephone service (basic service). The Commission found that the current definition of basic service met the goal of maintaining affordability and quality of basic service.[16]

Pursuant to SB 09-272, signed by Governor Bill Ritter on May 1, 2009, and SB 09-279, signed by Governor Bill Ritter on June 1, 2009, Staff, as Administrator of the CHCSM fund, transferred $15,000,000 (fifteen million) to Fund 227, the Colorado High Cost Administration Fund, and that money was then moved to the State of Colorado General Fund. This transfer occurred in June 2009.

On July 30, 2010, Western Wireless Holding Co., Inc. (Western Wireless) filed an application to relinquish its ETC and EP designations in Colorado due to the company being acquired by Cellco Partnership, doing business as Verizon Wireless.[17] The support amount Western Wireless received for Colorado will be redistributed to other competitive ETC providers in Colorado.[18]

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[16] *See* Commission Order No. C09-1411 issued in Proceeding No. 09I-493T on December 21, 2009.

[17] *Application of Cellco Partnership d/b/a Verizon Wireless and Atlantis Holdings LLC for Consent to Transfer Control of Licenses. Authorizations, and Spectrum Manager and de Facto Transfer of Leasing Arrangements*, WT Docket No. 08-95, Memorandum Opinion and Order and Declaratory Ruling, 23 FCC Rcd 17444 (2008).

[18] Western Wireless received approximately $3.6 Million per year in federal support for providing service in high cost areas.

Qwest increased their rate for basic local exchange service to $17.00 effective October 1, 2010. The PUC decision approving the $17.00 rate was challenged in the Supreme Court. The Supreme Court upheld the $17.00 basic exchange service rate for Qwest in a decision issued April 30, 2012. In addition, independently the new Commission Rules adopted in Proceeding No. 10R-191T will require Qwest (and other providers seeking CHCSM funds) to impute a residential benchmark of $17.00 and a business benchmark of $35.02, that will potentially affect the carrier's future support amount.[19]

On April 7, 2010, the Commission opened Proceeding No. 10R-191T - Notice of Proposed Rulemaking to address proposed changes to the CHCSM. Among other changes, the proposed rules addressed the areas of which lines should be supported, whether interconnected VoIP providers should contribute, the benchmark rate, and annual reporting. Comments were filed August 2, 2010; Reply Comments September 10, 2010; and Closing Comments October 18, 2010. A hearing was held on September 27, 2010. After receiving oral comments by all persons wishing to give summaries of their respective positions, the Commission directed the formation of "panels" for the parties to present their positions on six thematic areas. The panels addressed: whether the rulemaking should go forward; whether VoIP providers should be required to contribute to the HCSM; which access lines should receive HCSM support; whether to repeal the identical support rule for competitive eligible providers; whether to implement a statewide benchmark rate for calculating HCSM support; how/what revenues should be included in calculating HCSM support; what are the appropriate reporting requirements so as to justify the receipt of a certain level of HCSM support; and should the Commission require providers to offer service within one year of receiving ETC and EP designation.

A Commissioners' deliberations meeting was held on December 28, 2010, to discuss the proposed rules, which proposed rules had been drafted to support only residential lines, and to set forth changes in revenue and cost calculations that would reduce the support amount to carriers. However, during the rulemaking proceeding several written alternative proposals to modify the HCSM were presented that would result in fewer specific rule changes and reduce the size of the fund. The alternative proposal to eliminate support to any exchange that is eligible to receive $10 or less in support sparked

[19] Carriers seeking additional CHCSM support with local exchange rates below the new benchmark rates will have to impute the new benchmark rates when calculating their revenue.

discussion among the Commissioners at their deliberations meeting. The discussion evolved into a phase-down approach where each provider's support would be reduced by a dollar amount over a six-year period. To provide an opportunity for analysis and consideration of this alternative proposal, the Commissioners held a second deliberations meeting on January 6, 2011 at which Commission Staff (Staff) presented an analysis of the potential impact, if implemented, it would have to the HCSM and its fund.

Commission Decision No. C11-0232 in Proceeding No. 10R-191T, adopting new rules was mailed March 3, 2011. In summary, these rules adopted a mechanism to set the benchmark rates, a phase-down of the HCSM fund, an extraordinary circumstance rule for additional support, retained the identical support rule, and did not adopt an explicit mandatory contribution to the HCSM by VoIP providers.

Upon reconsideration of comments filed by the providers, the Commission rescinded the phase-down approach in Decision No. C11-0232. However, the Commission retained the benchmark statewide average rate for residential service and business service at $17.00 and $35.02. In addition, they retained the identical support rule, the extraordinary circumstance requirement, and did not explicitly require VoIP providers to contribute to the fund, as well as clarified certain rules. The Commission withdrew the phase-down approach in favor of a more comprehensive review currently being undertaken in the telecommunications reform Proceeding No. 10M-565T (see discussion below). However, the Commission determined that by retaining the benchmark rates, the HCSM fund would not be providing subsidies greater than necessary. These rules reduced the HCSM support amount for new carriers seeking support and for carriers that seek to reset their support amount. The rules were implemented in January 2012.

In August 2010, the Commission convened a Telecommunications Advisory Group (TAG) to discuss and inform the Commission on necessary changes in three key areas of reform: retail services deregulation, universal service, and intrastate access. The Commission held multiple Commission Information Meetings and collected important data regarding competition in the telecommunications marketplace in Colorado. In parallel with the TAG efforts, Colorado General Assembly Senate Bill 12-157 (SB12-157), also known as the Telecom Modernization Act of 2012, was introduced. This bill sought to reform the telecommunications laws and establish certain policy directives and implementation methodologies. While the introduction of the bill furthered the dialogue regarding the Colorado telecommunications marketplace, the bill was postponed indefinitely on May 4, 2012.

SB 10-1281 would have permanently exempted interconnected VoIP from regulation by the PUC. In addition, SB 10-1281 would have reclassified Qwest's local exchange service from Part 2 to Part 3 in the State telecommunications framework. Part 3 service means that it would be subject to less regulation. This bill was vetoed by the Governor on June 7, 2010. SB 10-135 was introduced regarding an exemption from the 911 surcharge for customers receiving subsidies under federal programs. This bill died.

SB 11-262 was introduced on April 25, 2011 and would have eliminated price regulation for all but basic local exchange service and emergency service and phased out the high cost support mechanism. It would also have required VoIP providers to contribute to any high cost fund mechanism, and would have required intrastate access rates to eventually match interstate rates. It was assigned to the Senate Business, Labor & Technology Committee but was postponed indefinitely. SB 12-157 was introduced March 8, 2012 and would have transferred money from the CHCSM for rural broadband expansion, would have phased out high cost support by 2025, and would have eliminated price controls for all services except basic local exchange service. The bill was postponed indefinitely May 4, 2012.

The Telecom Advisory Group (TAG) was established in August, 2010 to study and inform the Commission on marketplace, technology, legal, regulatory and other changes currently taking place in the telecommunications environment. The Commission identified three critical issues to be addressed: 1) Retail Services Deregulation, 2) Intrastate Access Charges, and 3) Universal Service. These issues were analyzed in Proceeding No. 10M-565T, and led to the initiation of Proceeding 12R-862T (discussed above) which proposes amended rules to set forth a regulatory framework for determining the existence of effectively competitive areas, the elimination of funding from the CHCSM in effectively competitive areas, addressing limited regulatory treatment of IP-enabled and Interconnected VoIP services, and making permanent certain previous emergency rules set forth in Rule 2202, 2203, 2843, and 2856.

On November 28th, 2011, FCC Decision 11-161 (*CAF Order*) was released. The *CAF Order* established basic principles and goals that guide the FCC's universal service initiative. The scope of universal service was expanded to include broadband. Specifically, the new federal goals are to:

1. Preserve and advance universal availability of voice service.
2. Ensure universal availability of modern networks capable of providing voice and broadband service to homes, businesses, and community anchor institutions.
3. Ensure universal availability of modern networks capable of providing advanced mobile voice and broadband service.
4. Ensure that rates for broadband services and rates for voice services are reasonably comparable in all regions of the nation.
5. Minimize the universal service contribution burden on consumers and businesses.

The *CAF Order* created a new support mechanism which it calls the "Connect America Fund (CAF). The CAF will distribute the budgeted funds using a variety of mechanisms. Different support mechanisms will apply to different kinds of providers. There is one division between "remote areas" and other areas. Another division is between wireless and wireline carriers. Finally, wireline carriers are divided between price cap and rate-of-return carriers. While the *CAF Order* prescribed new goals that include broadband, it limited the funds that will be available to meet those goals. It set an annual $4.5 billion FUSF (Federal Universal Service Fund) budget. Within this overall budget, separate sub-budgets were also established:

1. $1.8 billion will be distributed among price cap ILECs.
2. $2.0 billion will be distributed to rate-of-return ILECs.
3. $0.5 billion will be distributed to wireless carriers.
4. $0.1 billion will be distributed to remote areas.

In addition, the *CAF Order* requires that ETCs of all kinds will be required to meet federal standards for broadband. ETC-offered broadband must meet basic performance requirements, and the ETC must report regularly on associated performance measures. Similar to the support amounts, performance requirements are different for each kind of carrier.

In *the first phase* of the *CAF Order (CAF I)*, additional funding for price cap carriers is available to extend robust, scalable broadband to hundreds of thousands of unserved Americans beginning in early 2012. To enable this deployment, all existing legacy high-cost support to price cap carriers was frozen, and an additional $300 million in CAF funding was made available. In Colorado CenturyLink notified the Commission in July, 2012 that it accepted approximately $6.1 Million CAF I funding to build out broadband in un-served locations in Colorado. Frozen support will be immediately subject to the goal of achieving universal availability of voice and broadband, and subject to obligations to build and operate broadband-capable networks in areas un-served by an unsubsidized competitor over time. Any carrier electing to receive the additional support will be required to deploy broadband and offer service that satisfies new public interest obligations to an un-served location for every $775 in incremental support. Specifically, carriers that receive this additional support must provide broadband with actual speeds of at least 4 Mbps downstream and 1 Mbps upstream, with latency suitable for real-time applications and services such as VoIP, and with monthly usage capacity reasonably comparable to that of residential terrestrial fixed broadband offerings in urban areas. In addition existing support levels will be reduced in any areas where a price cap company charges artificially low end-user voice rates. CenturyLink was eligible to receive at least $90 million in 2013 from CAF I round II. CenturyLink accepted $54 million (region wide) of this funding to deploy broadband to unserved high-cost areas. In *CAF II* a combination of a forward-looking broadband cost model and competitive bidding will be used to efficiently support deployment of networks providing both voice and broadband service for five years. In addition, reforms were adopted to: (1) establish a framework to limit reimbursements for excessive capital and operating expenses, which was implemented July 1, 2012; (2) encourage efficiencies by extending existing corporate operations expense limits to the existing high-cost loop support and interstate common line support mechanisms, effective January 1, 2012; (3) ensure fairness by reducing high-cost loop support for carriers that maintain artificially low end-user voice rates, with a three-step phase-in which began July 1, 2012; (4) phase out the Safety Net Additive component of high-cost loop support over time; (5) address Local Switching Support as part of comprehensive ICC reform; (6) phase out over three years support in study areas that overlap completely with an unsubsidized facilities-based terrestrial competitor that provides voice and fixed broadband service, beginning July 1, 2012; and (7) cap per-line support at $250 per month, with a gradual phasedown to that cap over a three-year period commencing July 1, 2012. In addition, identical support is frozen per study area as of year-end 2011, and phased down existing support over a five-year period beginning July 1, 2012.[20]

The CAF Order also established a Mobility Fund. In its Order, the FCC established “ubiquitous availability of mobile services as a universal service goal.”[21] In aid of accomplishing that goal, the FCC established two mobility funds: one fund (the Mobility Fund Phase I) that distributed one-time support in the short term to provide 3G or better service to currently un-served areas; and another longer-term fund (the Mobility Fund Phase II) to provide ongoing support for mobile services. Viaero received approximately $32 Million to build out 4,000 road miles in Colorado. The goal of the Mobility Fund Phase I is to “extend the availability of mobile voice service on networks that provide 3G or better performance and to accelerate the deployment of 4G wireless networks in areas where it is cost effective to do so with one-time support.”[22] The Mobility Fund I will total $300 million, and was distributed through a reverse auction held in 2012. A separate $50 million fund will be distributed to build mobile networks in un-served Tribal areas.

III. Administration

As Administrator, the Commission administers billing, collection, and disbursement functions for the CHCSM. It also collects information regarding contributing entities and end-user intrastate telecommunications revenues, submits projections of demand, determines benchmarks used, determines the amount of distributions made from the CHCSM, and records the cost of administrative expenses.

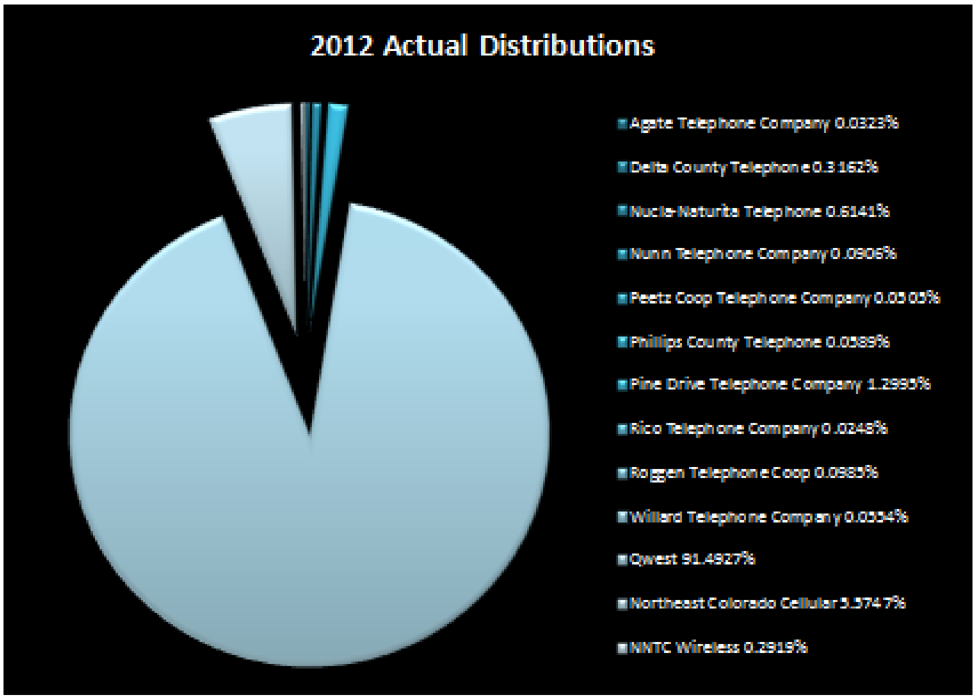
The functions of the Administrator also include, but are not limited to, development of applications and associated instructions as needed for the CHCSM, administering the process to ensure compliance with the Commission rules and regulations, updating the website for such processes, and development and implementation of other processes unique to the CHCSM.

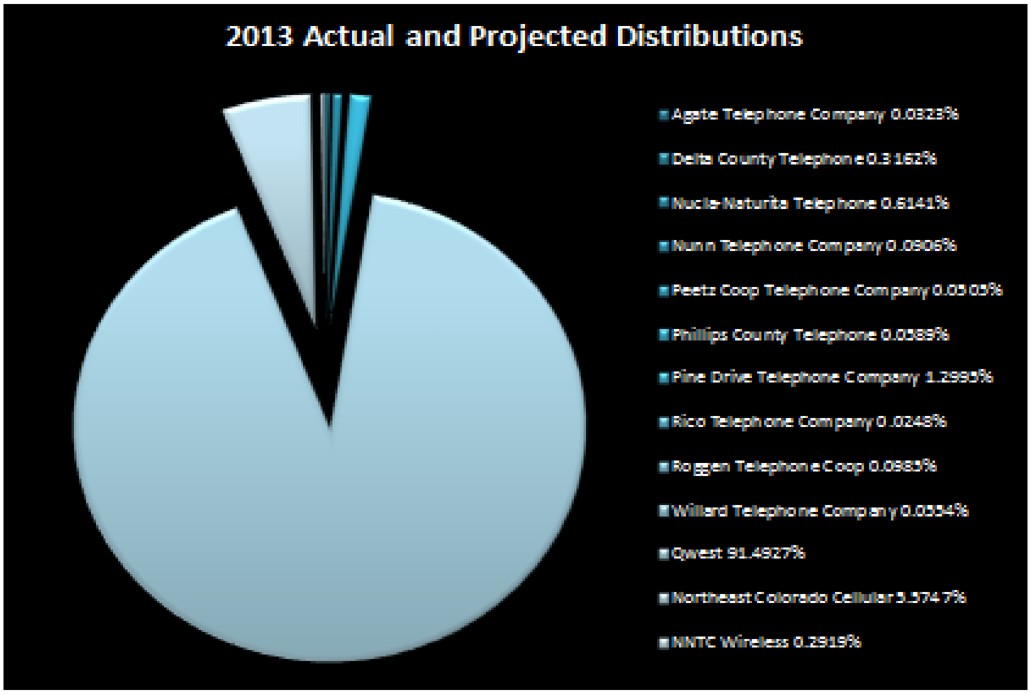
20 Connect America Fund & Intercarrier Compensation Reform Order and FNPRM Executive Summary
21 *CAF Order* ¶ 298
22 *CAF Order* ¶ 322

The Commission, as the Administrator, continues to take enforcement actions (complaint proceedings) against certain delinquent telecommunications service providers who are not in compliance with the Commission rules and continues to conduct audits of data submitted by providers. Due to the rapidly changing fortunes of telecommunications service providers, the Commission must take these actions to ensure that each provider is contributing to the CHCSM amounts that the provider has collected from its customers or should have collected.

On August 6, 2002, the Commission entered into a Memorandum of Understanding (MOU) with CenturyTel, Inc. (CenturyTel) to become the Custodial Receiver of certain contributions to the CHCSM and be required, under direction from the Commission, to transfer funds to eligible high cost support recipients each quarter. Under the terms of the MOU, CenturyTel established a separate segregated account (Escrow Account) at Regions Morgan Keegan Trust (Regions). Regions provided banking and investment management services. Prior to CenturyTel, Qwest was the Custodial Receiver of the CHCSM funds. With the merger of CenturyTel and Qwest, and Qwest status drawing from the CHCSM fund, it was necessary to transition the Custodial Receiver function to a new provider. Effective November 1, 2011, Solix became the new Custodial Receiver for contributions to the CHCSM and in addition will assume other duties currently performed by the Administrator. The Custodial Receiver functions were transitioned from CenturyTel to Solix October 31, 2011.
The Solix contract is $60,000 in year one (2010), and is renewable for up to four additional years, with minor increases each year if the contract is renewed. The Solix contract results in an annual savings of over $200,000 for the fund. The Solix contract was renewed for the October 31, 2012 through October 31, 2013 period at an amount of $61,200, and renewal is anticipated for the period of October 31, 2013 through October 31, 2014 in the amount of $62,400.

The following charts summarize the dollar value of distributions from and contributions, both actual and projected to the CHCSM fund for calendar years 2006 through 2014. The first chart shows the percentage of actual CHCSM distributions to EPs for 2012. The second chart shows the percentage of CHCSM distributions, both actual and projected, to EPs for 2013. The third chart shows the projected 2014 CHCSM distributions including additional carriers that will seek CHCSM funding. The fourth chart summarizes the dollar value of distributions from and contributions to the fund for calendar years 2006 through 2014.


2012 Actual Distributions
Agate Telephone Company 0.0323%
Delta County Telephone 0.3162%
Nucla-Naturita Telephone 0.6141%
Nunn Telephone Company 0.0906%
Peetz Coop Telephone Company 0.0505%
Phillips County Telephone 0.0589%
Pine Drive Telephone Company 1.2995%
Rico Telephone Company 0.0248%
Roggen Telephone Coop 0.0985%
Willard Telephone Company 0.0554%
Qwest 91.4927%
Northeast Colorado Cellular 5.5747%
NNTC Wireless 0.2919%


2013 Actual and Projected Distributions
Agate Telephone Company 0.0323%
Delta County Telephone 0.3162%
Nucla-Naturita Telephone 0.6141%
Nunn Telephone Company 0.0906%
Peetz Coop Telephone Company 0.0505%
Phillips County Telephone 0.0589%
Pine Drive Telephone Company 1.2995%
Rico Telephone Company 0.0248%
Roggen Telephone Coop 0.0985%
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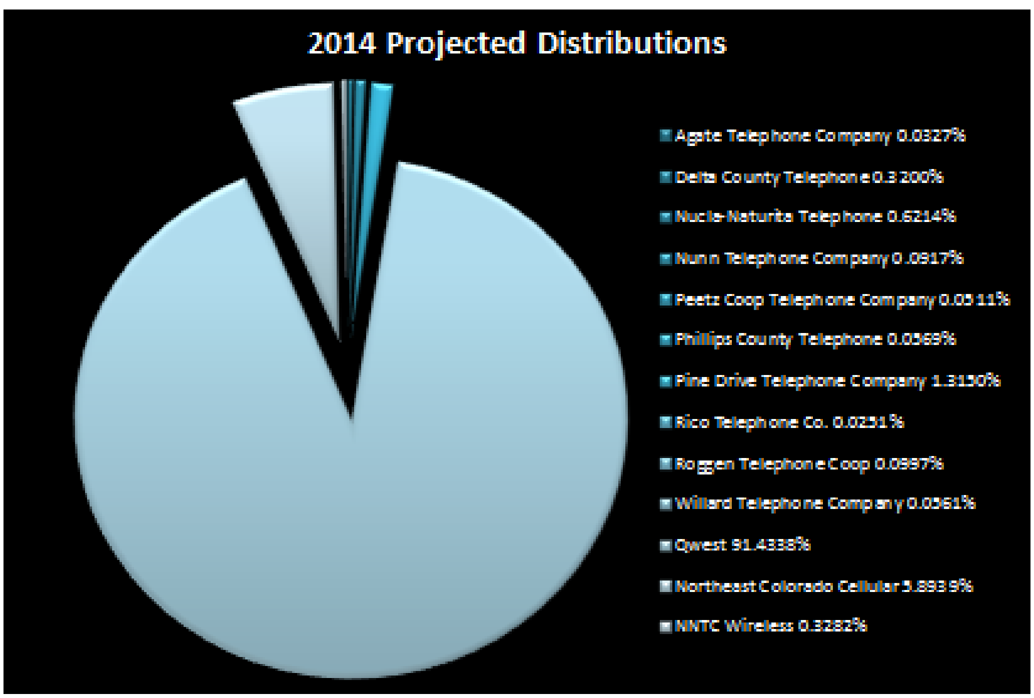
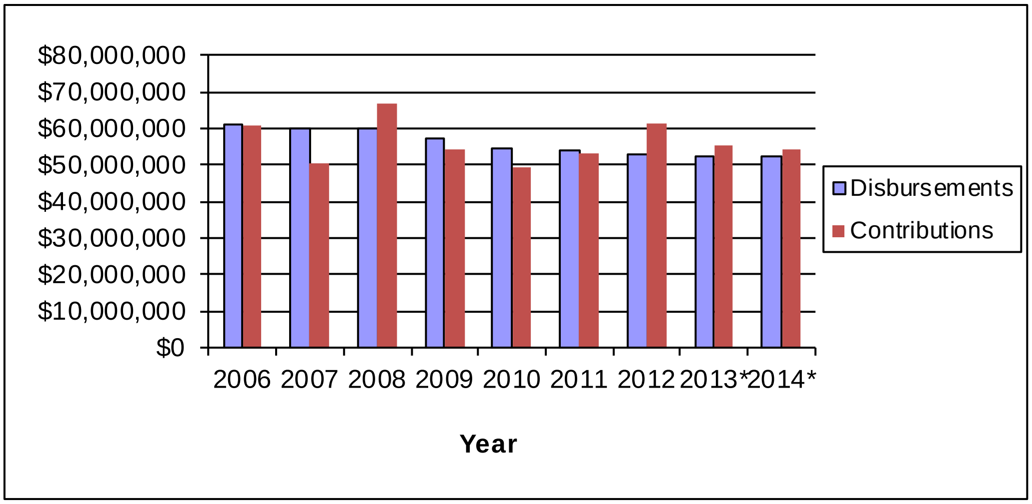

2014 Projected Distributions
Agate Telephone Company 0.0327%
Delta County Telephone 0.3200%
Nucla-Naturita Telephone 0.6214%
Nunn Telephone Company 0.0917%
Peetz Coop Telephone Company 0.0511%
Phillips County Telephone 0.0569%
Pine Drive Telephone Company 1.3150%
Rico Telephone Co. 0.0251%
Roggen Telephone Coop 0.0997%
Willard Telephone Company 0.0561%
Qwest 91.4338%
Northeast Colorado Cellular 5.8939%
NNTC Wireless 0.3282%

Summary of Contributions and Disbursements



* Contributions for the years 2013 and 2014 are estimated.

IV. Coordination of State and Federal Universal Service Support

The CHCSM is coordinated with the Federal USF. As a result of the USF offset, the rural carriers receive proportionally more support from the USF fund than from the CHCSM. Conversely, Qwest receives more support from the CHCSM than it does from the USF.

Federal USF has historically consisted of five components of support:

1) High Cost Loop with two subcomponents – Safety Valve Support and Safety Net Additive Support;

a) High Cost Loop Support – available to rural ETCs and to competitive ETCs - provides support for the "last mile" of connection for rural companies in service areas where the cost to provide this service exceeds 115 percent of the national average cost per line. Qwest and Rico are the only ETCs that do not receive this support.

b) Safety Net Additive Support - is intended to provide carriers with additional incentives to invest in their networks. To qualify, a rural carrier must show that growth in a telecommunications plant in service (TPIS) per line is at least 14 percent greater than the study area's TPIS per line in the prior year. Six rural ETCs (Agate, Blanca, Nunn, Peetz, Plains, Rye, and Willard) receive this support as well as Western Wireless and NE Colorado Cellular.

c) Safety Valve Support – additional support for carriers that buy or acquire exchanges and make substantial post-transaction investments to enhance network infrastructure. There are no ETCs in the State of Colorado that receive this support.

2) High Cost Model Support (HCM) - support intended to keep the cost for telephone service comparable in all areas (urban and rural) of a state. HCM support is distributed at the wire center level and is targeted to carriers serving wire centers with forward-looking costs that exceed the national benchmark. There are no ETCs in the State of Colorado that receive this support.

3) Interstate Access Support – available to non-rural ETCs and to some competitive ETCs. This support was established when the FCC removed implicit support from interstate access charges and established an explicit component for price-cap carriers. El Paso, Qwest, NECC, and Western Wireless receive this support.

4) Interstate Common Line Support – available to rural ETCs and some competitive ETCs to help offset interstate access charges and is designed to permit each rate-of-return carrier to recover its common line revenue requirement, while ensuring that its subscriber line charges remain affordable to its customers. All carriers receive this support with the exception of El Paso and Qwest.

5) Local Switching Support – available to rural ETCs and some competitive ETCs to reimburse some high switching cost in order to provide service to fewer customers. All carriers receive this support with the exception of CenturyTel of Eagle and Qwest.

Effective January 1, 2012, the FCC froze all support under their high-cost support mechanisms, HCLS (includes SNA), forward-looking model support (HCMS), safety valve support, LSS, IAS and ICLS on a study area basis for price cap carriers and their rate-of-return affiliates. The FCC will provide on an interim basis frozen high-cost support to such carriers equal to the amount of support each carrier received in 2011 in a given study area. Further, frozen high-cost support will be reduced to the extent that a carrier’s rates for local voice service fall below an urban local rate floor. The amount of Frozen High Cost Support in 2012 was approximately $50,000,000.

In addition, effective January 1, 2012, the FCC eliminated Local Switching Support (LSS) as a separate support mechanism.

The USF/ICC Transformation Order also adopted a rule to limit high-cost support for incumbent LECs where end-user rates do not meet a specified local rate floor. Affected carriers were required to file make an annual rate floor filing by July 1, 2013. To avoid reductions in HCLS, recipients of that support were required to meet an initial rate floor of $10 for the period of July 1, 2012 through June 30, 2013. Five carriers raised their local rates in 2013.

The following tables summarize the federal and state universal service distributions paid to EPs for calendar years 2012 and 2013. Table 1 shows actual federal and state universal service distributions to eligible carriers for 2012. Table 2 shows projected federal and state universal service distributions to eligible carriers for 2013 using nine months of actual data and three months of projections.

Table 1

2012 High Cost Support						
Rural Carrier	**# of Lines**	**FUSF**	**FUSF / Line**	**CHCSM**	**CHCSM / Line**	**Total Support**
AGATE MUTUAL TEL CO	96	$ 536,067	$ 5,584	$ 16,941	$ 176	$ 553,008
BIG SANDY TELECOM	760	$ 155,781	$ 205	$ -	$ -	$ 155,781
BIJOU TEL COOP ASSOC	1113	$ 1,254,033	$ 1,127		$ -	$ 1,254,033
BLANCA TEL CO	707	$ 2,541,264	$ 3,594	$ -	$ -	$ 2,541,264
CENTURYTEL OF EAGLE	55,013	$ 17,487,960	$ 318	$ -	$ -	$ 17,487,960
CENTURYTEL COLORADO	7,869	$ 3,073,662	$ 391	$ -	$ -	$ 3,073,662
COLUMBINE ACQ CORP	1,282	$ 600,387	$ 468	$ -	$ -	$ 600,387
DELTA COUNTY TEL CO	7,739	$ 1,029,936	$ 133	$ 165,721	$ 21	$ 1,195,657
EASTERN SLOPE RURAL	3,850	$ 2,095,719	$ 544	$ -	$ -	$ 2,095,719
EL PASO COUNTY TEL	2,984	$ 424,257	$ 142	$ -	$ -	$ 424,257
FARMERS TEL CO - CO	468	$ 821,892	$ 1,756	$ -	$ -	$ 821,892
HAXTUN TEL CO	1,215	$ 584,124	$ 481	$ -	$ -	$ 584,124
NUCLA-NATURITA TEL	1,445	$ 1,154,199	$ 799	$ 321,867	$ 223	$ 1,476,066
NUNN TEL CO	497	$ 1,810,065	$ 3,642	$ 47,485	$ 96	$ 1,857,550
PEETZ COOP TEL CO	222	$ 382,326	$ 1,722	$ 26,441	$ 214	$ 429,811
PHILLIPS COUNTY TEL	1,523	$ 2,250,714	$ 1,478	$ 30,847	$ 17	$ 2,277,155
PINE DRIVE TEL CO	765	$ 196,734	$ 257	$ 681,059	$ 890	$ 877,793
PLAINS COOP TEL ASSN	1,092	$ 2,101,482	$ 1,924	$ -	$ -	$ 2,101,482
RICO TEL CO	135	$ 137,790	$ 1,021	$ 13,015	$ 96	$ 150,805
ROGGEN TEL COOP CO	195	$ 592,935	$ 3,041	$ 51,614	$ 265	$ 644,549
RYE TELEPHONE CO	2,062	$ 3,204,078	$ 1,554	$ -	$ -	$ 3,204,078
SOUTH PARK TEL CO	151	$ 1,000,026	$ 6,623	$ -	$ -	$ 1,000,026
STONEHAM COOP TEL CO	59	$ 63,984	$ 1,084	$ -	$ -	$ 63,984
STRASBURG TEL CO	1,457	$ 444,138	$ 305	$ -	$ -	$ 444,138
SUNFLOWER TEL - CO	220	$ 96,894	$ 440	$ -	$ -	$ 96,894
WIGGINS TEL ASSOC	1,439	$ 3,212,219	$ 2,232	$ -	$ -	$ 3,212,219
WILLARD TEL CO	49	$ 69,714	$ 1,423	$ 29,042	$ 593	$ 98,756
Non-Rural Carrier						
QWEST CORPORATION*	432,518	$ 23,343,888	$ 56	$ 48,553,314	$ 116	$ 71,897,202
Competitive LEC						
SAN ISABEL TELECOM, INC.	1,774	$ 250,584	$ 276	$ -	$ -	$ 250,584
Wireless Carriers						
NORTHEAST COLORADO CELLULAR, INC., dba VIAERO***	12,340	$ 8,905,450	$ 917	$ 2,796,321	$ 243	$ 11,701,771
NNTC WIRELESS, LLC**	NA	$ 4,497	$ -	$ 31,509	$ -	$ 36,006
TOTAL DISBURSEMENTS		**$ 79,826,799**		**$ 52,765,176**		**$ 132,608,613**

Line counts are from 2012 Annual Reports
* Qwest line counts from 2012 Qwest Draw Stipulation. Supported lines.
** NNTC only files one wire center and wire center specific data is confidential
*** Viaero line counts from reports submitted by carrier. Total supported lines.

Table 2

2013 High Cost Support								
Rural Carrier	# of Lines	FUSF	FUSF / Line	CHCSM	CHCSM / Line	Total Support	Residential Basic Local Service Rate	Business Basic Local Service Rate
AGATE MUTUAL TEL CO	96	$ 460,204	$ 4,794	$ 16,941	$ 176	$ 477,145	$ 14.09	$ 14.09
BIG SANDY TELECOM	760	$ 122,304	$ 161	$ -	$ -	$ 122,304	$ 15.44	$ 25.18
BIJOU TEL COOP ASSOC	1113	$ 922,207	$ 829		$ -	$ 922,207	$ 13.59	$ 20.14
BLANCA TEL CO	707	$ -	$ -	$ -	$ -	$ -	$ 16.11	$ 22.11
CENTURYTEL OF EAGLE	55,013	$ 15,345,492	$ 279	$ -	$ -	$ 15,345,492	$ 14.74	$ 36.79
CENTURYTEL COLORADO	7,869	$ 2,793,865	$ 355	$ -	$ -	$ 2,793,865	$ 11.77	$ 36.79
COLUMBINE ACQ CORP	1,282	$ 491,278	$ 383	$ -	$ -	$ 491,278	$ 18.98	$ 32.28
DELTA COUNTY TEL CO	7,739	$ 984,743	$ 127	$ 165,721	$ 21	$ 1,150,464	$ 16.20	$ 28.70
EASTERN SLOPE RURAL	3,850	$ 1,636,041	$ 425	$ -	$ -	$ 1,636,041	$ 13.36	$ 16.03
EL PASO COUNTY TEL	2,984	$ 356,028	$ 119	$ -	$ -	$ 356,028	$ 15.40	$ 30.60
FARMERS TEL CO - CO	468	$ 623,007	$ 1,331	$ -	$ -	$ 623,007	$ 16.74	$ 25.12
HAXTUN TEL CO	1,215	$ 283,649	$ 233	$ -	$ -	$ 283,649	$ 13.70	$ 20.55
NUCLA-NATURITA TEL	1,445	$ 1,145,565	$ 793	$ 321,867	$ 223	$ 1,467,432	$ 16.95	$ 24.81
NUNN TEL CO	497	$ 1,468,476	$ 2,955	$ 47,485	$ 96	$ 1,515,961	$ 20.56	$ 30.86
PEETZ COOP TEL CO	222	$ 279,131	$ 1,257	$ 26,441	$ 119	$ 305,572	$ 15.50	$ 19.85
PHILLIPS COUNTY TEL	1,523	$ 2,056,544	$ 1,350	$ 30,847	$ 20	$ 2,087,391	$ 14.55	$ 17.55
PINE DRIVE TEL CO	765	$ 215,968	$ 282	$ 681,059	$ 890	$ 897,027	$ 17.05	$ 18.63
PLAINS COOP TEL ASSN	1,092	$ 1,850,191	$ 1,694	$ -	$ -	$ 1,850,191	$ 20.62	$ 25.25
RICO TEL CO	135	$ 65,001	$ 481	$ 13,015	$ 130	$ 78,016	$ 20.65	$ 25.95
ROGGEN TEL COOP CO	195	$ 291,621	$ 1,495	$ 51,614	$ 265	$ 343,235	$ 17.00	$ 20.50
RYE TELEPHONE CO	2,062	$ 2,412,302	$ 1,170	$ -	$ -	$ 2,412,302	$ 19.70	$ 30.00
SOUTH PARK TEL CO	151	$ 694,405	$ 4,599	$ -	$ -	$ 694,405	$ 29.98	$ 39.98
STONEHAM COOP TEL CO	59	$ 29,808	$ 505	$ -	$ -	$ 29,808	$ 16.26	$ 16.26
STRASBURG TEL CO	1,457	$ 257,821	$ 177	$ -	$ -	$ 257,821	$ 16.40	$ 26.40
SUNFLOWER TEL - CO	220	$ 81,987	$ 373	$ -	$ -	$ 81,987	$ 14.00	$ 21.00
WIGGINS TEL ASSOC	1,439	$ 3,175,551	$ 2,207	$ -	$ -	$ 3,175,551	$ 19.84	$ 23.84
WILLARD TEL CO	49	$ 33,903	$ 692	$ 29,042	$ 593	$ 62,945	$ 16.27	$ 16.27
Non-Rural Carrier								
QWEST CORPORATION	432,518	$ 15,870,342	$ 38	$ 47,951,148	$ 115	$ 63,821,490	$ 17.00	$ 35.02
Competitive LEC								
SAN ISABEL TELECOM, INC.	1,774	$ 189,941	$ 217	$ -	$ -	$ 189,941	$ 12.22	$ 24.31
Wireless Carriers								
N.E. COLORADO CELLULAR, INC., dba VIAERO	12,340	$ 12,430,538	$ 1,131	$ 2,921,676	$ 297	$ 15,352,214	$ 15.00	$ 15.00
NNTC Wireless, LLC**	NA	$ 3,336	$ -	$ 152,974	$ -	$ -		
COMMNET FOUR CORNERS	0	$ -	$ -	$ -	$ -	$ -		
ELBERT COUNTY WIRELESS	0	$ -	$ -	$ -	$ -	$ -		
TOTAL DISBURSEMENTS		**$ 66,571,247**		**$ 52,409,830**		**$ 118,824,767**		

Line counts are from 2012 Annual Reports
FUSF Jan - Aug USAC Disbursement Data Actual - Projected Sept and 4Q2013
CHCSM Actual through 2Q2010 - Projected 3Q/4Q2013
** NNTC only files one wire center and wire center specific data is confidential
Qwest line counts from 2012 Qwest Draw Stipulation.
Viaero line counts from 2012 reports submitted by carrier. Total supported lines.

V. Operations - 2013

CHCSM support was provided to incumbent EPs who requested support to serve customers in high cost geographic areas in the calendar year 2013, and to two wireless carriers.

By fiscal 2013-2014 year-end, a projected $104,820 will be expensed by the Commission to administer the CHCSM which is in addition to the amount of $62,400 paid to Solix for managing the escrow account and performing certain administrative functions.

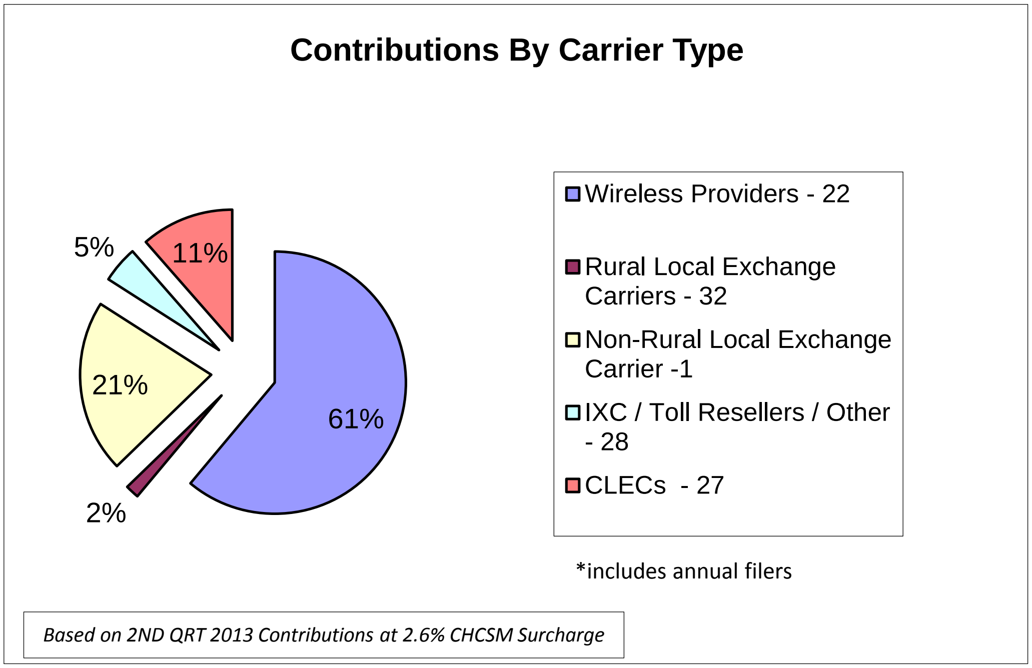
Net distributions from the CHCSM fund for 2013 are estimated to be $52,514,650. The method of calculation by which Qwest, and the wireless carriers, N.E. Colorado Cellular and NNTC Wireless, receive CHCSM support results in varying distribution amounts on a quarterly basis. CHCSM distributions for these three carriers are dependent on the number of access lines or customers each carrier was able to acquire in a specific wire center in a high cost area. The amount of high cost funding is based on the actual residential and business access line counts multiplied by the support per access line in that wire center. This contrasts with the manner in which the rural companies receive funding which is a fixed yearly dollar figure set by the Commission.

In 2013, a total of 13 EPs received support from the CHCSM. The support ranged from less than $0.25 per supported access line for a Qwest exchange to over $890.00 per supported access line for Pine Drive.

Section 40-15-208(2)(c), C.R.S., provides that if the Commission, through this report, proposes an increase above the amount contained in the previous calendar year's report in any of the following: (1) the proposed benchmark; (2) the contributions to be collected through a rate element; or (3) the total amount of distributions to be made for support in high cost areas, then such increase shall be suspended until March 31 of the budget year.

Contributions in 2013 to the CHCSM were made via an assessment on end-user intrastate telecommunications service revenues as billed by each telecommunications service provider. The rate element has been 2.6 percent since April 1, 2013. It is projected that the end-user rate element will remain at 2.6% through the first quarter of 2014. Depending upon future additional CHCSM draw petitions and contribution levels, the rate element may be adjusted beginning with the second or third quarter 2014.

In 2013, a total of 110 telecommunications providers contributed to the fund. The chart below depicts the approximate 2013 average breakdown by carrier type and the percentage of contributions to the fund.



In 2013, contributions from wireline providers have maintained at a steady level[23]. Twenty seven CLECs, including Comcast Phone of Colorado, LLC, continue to pay into the fund, with 2013 contributions similar to 2012. The de minimis level was reduced in 2012 to $5,000 a year with the new Commission rules.[24] Wireless providers' contributions remained basically consistent from 2012 to 2013 and represent approximately 61 percent of the revenues to the fund.

[23] Contribution dollar amounts were lower due to a lower CHCSM surcharge (2.6%), however on a relative basis contribution levels remained steady.

[24] The remainder of the CLECs are carriers below the de minimis level, which is currently set at $5,000 a year contribution.

VI. Projected Operations – 2014

Calendar Year 2014 Projections. Distributions from the fund will continue to be provided to both rural and non-rural EPs, including wireless carriers, who serve customers in high cost geographic areas. Based on anticipated future applications for CHCSM funding, it is forecasted that an additional $200,000 in distributions may be authorized. The total distribution for 2014 is estimated at $52,163,133 as identified below. Total projected contributions to the CHCSM fund are estimated to be $54,319,024[25]

[25] Based on the current 2.6% rate element.

Table 3

2014High Cost Support Projected Distributions				
Rural Carrier	**Number of Lines***	**Recent Adjustment Date**	**Yearly Projected CHCSM Disbursement**	
AGATE MUTUAL TEL CO	96	2/25/2008	$	16,941
DELTA COUNTY TEL CO	7739	10/1/2006	$	165,721
NUCLA-NATURITA TEL	1445	9/30/2011	$	321,867
NUNN TEL CO	497	5/17/2007	$	47,485
PEETZ COOP TEL CO	222	1/18/2008	$	26,441
PHILLIPS COUNTY TEL	1523	1/1/2009	$	30,847
PINE DRIVE TEL CO	765	10/24/2009	$	681,059
RICO TELEPHONE COMPANY	135	11/15/2011	$	13,015
ROGGEN TEL COOP CO	195	10/20/2009	$	51,614
WILLARD TEL CO	49	9/9/2010	$	29,042
Non-Rural Carrier				
QWEST CORPORATION**	436,182	11/16/2013		$47,356,450
Wireless Carriers				
NORTHEAST COLORADO CELLULAR, INC., dba VIAERO	12,340	1/26/2010	$	3,052,650
COMMNET FOUR CORNERS	0	8/8/2008	$	-
ELBERT COUNTY WIRELESS	0	8/8/2008	$	-
NNTC Wireless, LLC ****	NA	10/3/2012	$	170,000
Undesignated Carriers				
PROJECTED ADDITIONAL CARRIERS			$	200,000
TOTAL DISBURSEMENTS			**$**	**52,163,133**

* Line counts are from 2012 Annual Reports
** Qwest line counts from 2014 Qwest CHCSM Model run. Qwest 2014 Draw Stipulation is under discussion as of the publication date of this report. The 2014 Projected Draw is based on past year's negogtiated draw and is subject to revision.
*** Viaero line counts from reports submitted by carrier.
San Isabel has ETC designation, but not EP designation
Qwest and Viaero projection based on 2013 draw
**** NNTC only files one wire center and wire center specific data is confidential

Undesignated Carriers				
Other			$	200,000

Administration Expenses - 0.2% of total disbursements $104,326

The CHCSM distribution for Qwest will likely remain at the same level of support as 2013 for 2014, although a Stipulation and Settlement Agreement (Agreement)[26] between Staff, the Office of Consumer Counsel (OCC) and Qwest has not been completed as of the publication of this report. The Commission would also have to rule on any Stipulation. In the past, the Agreement has adopted a procedure similar to that used to determine the 2004 through 2012 high cost support amounts. The Agreement has used an average monthly per line costs produced by the HAI model used in Proceeding No. 99A-577T (HAI Model 5.2a) and updating the Qwest expense and investment figures with Qwest's 2007 ARMIS data and line count information. Based on these adjustments, Qwest's 2013 CHCSM authorized support was $56,174,188. However, it is important to note that the actual amount disbursed to Qwest is lower due to line loss. Parties to the Stipulation in 2012 agreed that Qwest shall not receive any more than $49,500,000 for 2013 CHCSM support.

Expenditures for administering the CHCSM in year 2014 are estimated to decrease slightly from 2013, The projected Commission administration cost requirement is $104,326 (or 0.2 percent of total disbursements). Personnel service costs include a percentage of employee wages, data processing, auditing, compliance activities, legal services, expenditures for the acquisition of computer software, and proxy cost model development and review.

In 2014, budgeted contributions to the CHCSM will again be made via an assessment on end-user intrastate telecommunications service revenues as billed by each telecommunications service provider. The desired level of reserve balance for the CHCSM fund has been approximately $12 to $14 million based on current distributions made to EPs. The target reserve balance has been set at approximately one quarter of net distributions to EPs in the past. The goal is to maintain a moderate reserve amount in the CHCSM fund so that the Commission, as Administrator, is prepared to make future CHCSM distributions from the fund to EPs. The target reserve balance of $12 to $14 million was compromised when $15 million was transferred to the State General Fund in 2010. Absent a significant increase to the high cost surcharge, it has been difficult to reestablish the $12 to $14 million fund balance. The Commission had set the rate element at 2.9 percent in order to meet distribution requirements. The balance is now approximately $15 million, which is approximately one quarter distribution. The balance of the fund had steadily decreased to the extent that the ability to meet the current carrier

[26] *See* PUC Proceeding No. 04M-388T.

disbursements may have been compromised if several potential scenarios were to play out and the rate element had not been increased to 2.9 percent in July 2011. Events that may impact the reserve fund balance are FCC actions that might place further pressure on the CHCSM, if VoIP providers decided to suspend voluntary contributions to the fund, if new providers seek initial support, and if economic and other forces result in further decreases to Colorado intrastate revenue. In addition, rural carriers have been losing access revenues and may seek to recover these funds from the CHCSM. The 2.9 percent rate element has rebuilt the reserve balance to the desired target balance, and thus enabled the Commission to decrease the rate element to 2.6% April 1, 2013. It is anticipated that the current 2.6% rate element will be sufficient to maintain the fund's target reserve balance and meet carrier disbursements in 2014.

VII. Activities, Legislation, and Rulemaking that Could Impact the CHCSM

On May 2, 2008, the FCC released an order that places an "interim emergency cap" on the amount of high cost universal service funding available to competitive eligible telecommunications carriers (CETCs). The order, which came in response to a Recommended Decision by the Federal-State Joint Board on Universal Service, caps the amount of universal support for CETCs at the amount available in each state as of March 2008, on an annualized basis. The FCC's action effectively eliminates the identical support rule, because wireless carriers will no longer receive the identical per-line support available to the incumbent local exchange carrier (ILEC) unless the wireless carrier can demonstrate the need for additional universal support based on its own costs. This difference will increase over time as supported wireless subscribers continue to grow relative to wireline customers. The interim cap is still in place and will remain in place until the FCC "adopts comprehensive high cost universal service reform."[27] The FCC also took action to reclaim high cost universal service support surrendered by a competitive ETC when it relinquishes its ETC status in any given state.[28] Rural cellular operators have asked a federal appeals court to review the FCC's action of placing a cap on the high cost universal service funding available to competitive ETCs. The U.S. Court of Appeals denied the carriers' petition for review of the FCC's actions.

[27] The FCC Order was released November 18, 2011..

[28] Western Wireless filed to relinquish its ETC and EP status in July 2010. Western Wireless was receiving approximately $3 million in UJSF support.

The FCC plan to reform and modernize the USF and the intercarrier compensation system was described generally above. While the effects of these changes and their impact are currently unknown, any reductions in federal USF support or changes to the intercarrier compensation process could place additional pressure on EPs in Colorado to seek new or additional CHCSM support.[29] In addition, decisions resulting from Commission actions in Proceedings 13M-0422T and 13M-0877T (both discussed above) could impact the size of the CHCSM fund.

On October 28, 2010, the FCC adopted rules that states may require nomadic interconnected VoIP service providers to contribute to state universal service funds. States can base their USF assessments on the portion of VoIP revenues that fall outside federal USF assessments on interstate VoIP revenues, whether that is the 35.1 percent of revenues outside the 64.9 percent of revenues that fall under a safe harbor in the 2006 FCC order, the revenues attributed to intrastate traffic by a providers' traffic study, or a provider-developed means of accurately classifying interconnected VoIP communications between federal and state jurisdictions. The state USF assessments cannot be retroactive.

Connecting America: The National Broadband Plan (NBP) sets forth recommendations under the guiding principle that everyone in the U.S. should have access to broadband services supporting a basic set of applications that include sending and receiving e-mail, downloading Web pages, photos and videos, and using simple video conferencing. The NBP recommends the FCC conduct a comprehensive reform of universal service and intercarrier compensation in three stages to close the broadband gap.

Stage One laid the foundation for reform (2010-2011) by improving the USF performance and accountability, creation of a Connect America Fund (CAF) and Mobility Fund, and the design of new USF funds in a tax-efficient manner to minimize the size of the gap. In Stage Two (2012-2016) the FCC began making disbursements from the CAF, potentially broadening the universal service contribution base, and began a staged transition of reducing per-minute rates for intercarrier compensation. In Stage Three the FCC will manage the total size of USF to remain close to its current size in order to minimize the burden of increasing universal service contributions on consumers,

[29] *Report and Order and Further Notice of Proposed Rulemaking* FCC 11-161, WC Docket No. 10-90, Docket No. 07-135, Docket No. 05-337, Docket No. 03-109, GN Docket No. 09-51, CC Docket No. 01-92, Docket No. 96-45 and WT Docket No. 10-208. Adopted October 27, 2011 and Released November 18, 2011.

eliminate the legacy High-Cost program, and continue to reduce intercarrier compensation rates by phasing out per-minute rates for all origination and termination of telecommunications traffic.

In response to the NBP, the FCC voted on October 27, 2011 on a package of reforms of the universal service system and the intercarrier compensation regime. Two new funds will be created, the CAF which will provide new funding, targeted initially to ILECs to build and maintain broadband networks, and the Mobility Fund which will support mobile broadband services. Total high cost funding (the existing funds plus the new CAF) will be fixed at the current funding level of $4.5 billion annually over the next six years.

Existing legacy high cost support to price cap carriers will be frozen and an additional $300 million in CAF funding will be available for “unserved” areas. In the second phase of the CAF plan, the FCC will use a combination of a forward-looking broadband cost model and competitive bidding to support deployment of networks providing both voice and broadband service for five years. The second-phase CAF will distribute up to $1.8 billion annually for areas with no unsubsidized broadband competitor. The FCC expects the cost model and competitive bidding processes for this phase will be adopted by December, 2012, with disbursements beginning in 2013. In conjunction with these changes, the FCC will also eliminate the identical support rule, which determines the amount of support competitive ETCs (mobile and wireline) receive under the high cost fund today. This will almost certainly result in reduced funding for most competitive ETCs receiving high cost funding. There will also be a gradual phase down of existing support to competitive providers over a five-year period which began on July 1, 2012.

The FCC also established a new Mobility Fund, designed to ensure availability of mobile broadband service in currently un-served areas. The creation of this new support mechanism does not automatically change existing legacy support, as mobile broadband carriers will continue to receive legacy support during the transition to the Mobility Fund.

This new mobility fund will be introduced in two phases. In Phase 1, the FCC will designate up to $300 million in one-time support to immediately accelerate deployment of networks for mobile voice and broadband services in un-served areas. These funds will be awarded through a nationwide reverse auction. Auction winners will be required to deploy 4G service within three years, or 3G service within two years. In addition, in Phase 1 the FCC will designate up to $50 million in additional universal service funding for Tribal lands. In Phase 2, the Mobility Fund will provide up to $500 million per year in ongoing support. Funding under this phase will focus on mobile voice and broadband services in communities in which service would be unavailable absent federal support. The $500 million budget will include up to $100 million in annual support for service on Tribal lands.

As mentioned previously, the Commission addressed proposed CHCSM rule changes in 2011. Based on the Commission's own motion, the phase-down rule of the proposed CHCSM rule changes was not adopted because the Commission believes that the better venue to discuss the size of the HCSM fund is in the telecom reform effort, Proceeding No. 10M-565T. However, the Commission retained the benchmark statewide average rate for residential service and business service at $17.00 and $35.02. In addition, they retained the identical support rule, the extraordinary circumstance requirement, and will not explicitly require VoIP providers to contribute to the fund, as well as clarified certain rules. However, the Commission determined that by retaining the benchmark rates, the HCSM fund would not be providing subsidies greater than necessary. These rules will reduce the HCSM support amount for new carriers seeking support and for carriers that seek to reset their support amount. As previously discussed, the telecom reform effort will examine universal service, access reform, retail deregulation and will take into account current FCC activity. The outcome of these efforts may result in the re-writing of Colorado statutes and Commission rules which may impact the CHCSM.

The Commission adopted emergency rules in Decision No. C12-0179, Proceeding No. 12R-148T, as a result of enactments made in the Federal Communications Report and Order and Notice of Proposed Rulemaking, issued November 18, 2011[30]. In addition to capping the HCSM fund, as previously discussed, switched access charges were capped by rate element for both ILECs (Incumbent Local Exchange Carriers) and CLECs (Competitive Local Exchange Carriers). Proposed updates to make these rules permanent were adopted in Proceeding No. 12R-862T, Decision No. C12-1442, as discussed above.

30 *See Report and Order and Further Notice of Proposed Rulemaking*, WC Docket No. 10-90, GN Docket No. 09-51, et. al. Order No. 11-161 (rel. November 18, 2011).

VIII. Summary and Supporting Schedules

Colorado High Cost Support Mechanism Summary of Contribution & Disbursements									
Year	2006	2007	2008	2009	2010	2011	2012	2013*	2014*
DISBURSEMENTS:									
Distributions	$60,773,727	$60,021,134	$59,771,795	$57,404,347	$54,398,318	$54,149,354	$52,765,176	$52,409,830	$52,163,133
Administrative Expenses									
Based on Fiscal Year	$151,800	$156,258	$101,248	$114,809	$108,161	$108,299	$105,530	$104,820	$104,326
Total Disbursements									
& Expenditures	**$60,925,527**	**$60,177,392**	**$59,873,043**	**$57,519,156**	**$54,506,479**	**$54,257,653**	**$52,870,706**	**$52,514,650**	**$52,267,459**
CONTRIBUTIONS:									
Jan 1 through March 31	$15,633,690	$5,135,111	$17,651,067	$14,131,269	$12,656,753	$12,388,848	$15,954,659	$14,849,222	$13,579,756
April 1 through June 30	$19,131,912	$12,418,529	$17,662,447	$13,892,486	$12,302,656	$11,938,072	$15,502,563	$13,579,756	$13,579,756
July 1 through Sept 30	$18,905,820	$15,937,966	$16,883,127	$13,193,954	$12,502,012	$12,992,037	$15,118,777	$13,579,756	$13,579,756
Oct 1 through Dec 31	$7,162,563	$17,231,201	$14,881,831	$12,839,486	$12,094,460	$16,137,809	$15,024,780	$13,579,756	$13,579,756
Total Contributions	**$60,833,985**	**$50,722,807**	**$67,078,472**	**$54,057,196**	**$49,555,881**	**$53,456,766**	**$61,600,778**	**$55,588,490**	**$54,319,024**

* Contributions for the year 2013 and 2014 are estimated.
The year 2013 contains actual information for the first six months.

CHCSM Summary of Distributions

Rural Carriers	Gross Distributions Calendar Year 2006	Gross Distributions Calendar Year 2007	Gross Distributions Calendar Year 2008	Gross Distributions Calendar Year 2009	Gross Distributions Calendar Year 2010	Gross Distributions Calendar Year 2011	Gross Distributions Calendar Year 2012	Gross Distributions Calendar Year 2013*	Gross Distributions Calendar Year 2014**
Agate Mutual Telephone Co.	$1,305	$1,305	$14,361	$16,941	$16,941	$16,941	$16,941	$16,941	$16,941
Delta County Tele-Comm	$93,447	$165,721	$165,721	$165,721	$165,721	$165,721	$165,721	$165,721	$165,721
Nucla-Naturita	$165,483	$0	$221,852	$242,020	$242,020	$242,020	$282,162	$321,867	$321,867
Nunn Telephone Company	$0	$36,588	$22,482	$58,540	$58,540	$47,485	$47,485	$47,485	$47,485
Peetz Cooperative Telephone Co.	$9,562	$5,464	$47,485	$26,441	$26,441	$26,441	$26,441	$26,441	$26,441
Phillips County Telephone Co.	$204	$168	$168	$30,847	$30,847	$30,847	$30,847	$30,847	$30,847
Pine Drive	$465,019	$450,075	$450,075	$450,075	$839,269	$681,059	$681,059	$681,059	$681,059
Rico Telephone Company						$1,255	$13,015	$13,015	$13,015
Roggen Telephone	$5,587	$4,648	$35,345	$51,614	$51,614	$51,614	$51,614	$51,614	$51,614
Willard	$0	$0	$0	$0	$11,366	$29,042	$29,042	$29,042	$29,042
Non-Rural Carrier									
Qwest Corp.	$57,947,414	$57,241,560	$56,787,689	$53,952,430	$50,346,487	$50,069,355	$48,553,314	$47,951,148	$47,356,450
Wireless Carriers									
Northeast Colorado Cellular	$2,085,706	$2,115,605	$2,026,785	$2,409,718	$2,608,961	$2,787,574	$2,796,321	$2,921,676	$3,052,650
NNTC							$31,509	$152,974	$170,000
Undesignated Carriers									
Projected Additional Carriers	$0	$0	$0	$0	$0	$0	$0	$0	$200,000
Totals	**$60,773,727**	**$60,021,134**	**$59,771,963**	**$57,404,347**	**$54,398,206**	**$54,149,354**	**$52,725,471**	**$53,316,719**	**$52,163,133**

* The disbursements for 2013 are actual information for January - September 2013 and estimated figures for October - December 2013.

* * Disbursements for 2014 are estimated.

Colorado High Cost Support Mechanism Rate Element

	2006	2007	2008	2009	2010	2011	2012	2013	2014*
1st Qtr	2.90%	1.60%	2.70%	2.20%	2.20%	2.20%	2.90%	2.90%	2.60%
2nd Qtr	2.90%	2.70%	2.70%	2.20%	2.20%	2.20%	2.90%	2.60%	2.60%
3rd Qtr	2.90%	2.70%	2.20%	2.20%	2.20%	2.90%	2.90%	2.60%	2.60%
4th Qtr	1.60%	2.70%	2.20%	2.20%	2.20%	2.90%	2.90%	2.60%	2.60%

* 2014 contains projections

Colorado High Cost Support per Residential Access Line per Month											
(CenturyLink Qwest exchanges and corresponding support)											
Exhange	City	CILI	Support per Line 2006	Support per Line 2007	Support per Line 2008	Support per Line 2009	Support per Line 2010	Support per Line 2011	Support per Line 2012	Support per Line 2013	Support per Line 2014*
COLORADO SPRINGS	AIR FORCE ACADEMY	AFACCOMA	$9.96	$9.86	$9.86	$11.77	$11.77	$11.77	$11.77	$11.77	$11.77
AGUILAR	AGUILAR	AGLRCOMA	$94.19	$91.48	$91.48	$89.79	$89.79	$89.79	$89.79	$89.79	$89.79
ALAMOSA	ALAMOSA	ALMSCOMA	$5.77	$7.10	$7.10	$7.95	$7.95	$7.95	$7.95	$7.95	$7.95
ALLENSPARK	ALLENS PARK	ALPKCOMA	$40.56	$39.26	$39.26	$37.26	$37.26	$37.26	$37.26	$37.26	$37.26
ARVADA ZONE	ARVADA	ARVDCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
ASPEN	ASPEN	ASPECOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
EATON-AULT	AULT	AULTCOMA	$42.16	$42.39	$42.39	$43.95	$43.95	$43.95	$43.95	$43.95	$43.95
AURORA ZONE	AURORA	AURRCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
AURORA ZONE	MONAGHAN	AURRCOMB	$21.62	$20.72	$20.72	$22.41	$22.41	$22.41	$22.41	$22.41	$22.41
PUEBLO	AVONDALE	AVDLCOMA	$63.77	$63.88	$63.88	$63.30	$63.30	$63.30	$63.30	$63.30	$63.30
VAIL	AVON	AVONCOMA	$3.68	$4.56	$4.56	$3.45	$3.45	$3.45	$3.45	$3.45	$3.45
BAILEY	BAILEY	BALYCOMA	$15.06	$15.58	$15.58	$15.71	$15.71	$15.71	$15.71	$15.71	$15.71
BRIGHTON	BRIGHTON	BITNCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
BOULDER	GUNBARREL	BLDRCOGB	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
BOULDER	BOULDER MAIN	BLDRCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
COLORADO SPRINGS	BLACK FOREST	BLFSCOMA	$12.52	$12.13	$12.13	$7.50	$7.50	$7.50	$7.50	$7.50	$7.50
BUENA VISTA	BUENA VISTA	BNVSCOMA	$15.89	$15.72	$15.72	$16.47	$16.47	$16.47	$16.47	$16.47	$16.47
BROOMFIELD	BROOMFIELD	BRFDCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
BRECKENRIDGE	BRECKENRIDGE	BRRGCOMA	$4.32	$5.31	$5.31	$5.09	$5.09	$5.09	$5.09	$5.09	$5.09
BRUSH	BRUSH	BRSHCOMA	$13.98	$15.29	$15.29	$17.55	$17.55	$17.55	$17.55	$17.55	$17.55
BERTHOUD	BERTHOUD	BRTHCOMA	$7.37	$7.09	$7.09	$8.13	$8.13	$8.13	$8.13	$8.13	$8.13
BASALT	BASALT	BSLTCOMA	$12.30	$11.54	$11.54	$11.38	$11.38	$11.38	$11.38	$11.38	$11.38
BAYFIELD	BAYFIELD	BYFDCOMA	$18.65	$16.57	$16.57	$15.85	$15.85	$15.85	$15.85	$15.85	$15.85
CANON CITY	CANON CITY	CACYCOMA	$0.76	$0.52	$0.52	$3.42	$3.42	$3.42	$3.42	$3.42	$3.42
COAL CREEK	COAL CREEK	CCCNCOMA	$16.87	$16.60	$16.60	$18.42	$18.42	$18.42	$18.42	$18.42	$18.42
GRAND JUNCTION	CLIFTON	CFTNCONM	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
CALHAN	CALHAN	CLHNCOMA	$54.04	$54.84	$54.84	$57.38	$57.38	$57.38	$57.38	$57.38	$57.38
COLORADO SPRINGS	GATEHOUSE	CLSPCO32	$1.33	$0.89	$0.89	$0.98	$0.98	$0.98	$0.98	$0.98	$0.98
COLORADO SPRINGS	COLO SPRINGS - EAST	CLSPCOEA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
COLORADO SPRINGS	COLORADO SPRINGS MA	CLSPCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
COLORADO SPRINGS	PIKEVIEW	CLSPCOPV	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
COLORADO SPRINGS	STRATMOOR	CLSPCOSM	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
CENTRAL CITY	CENTRAL CITY	CNCYCOMA	$12.44	$12.65	$12.65	$11.10	$11.10	$11.10	$11.10	$11.10	$11.10

Colorado High Cost Support per Residential Access Line per Month (CenturyLink Qwest exchanges and corresponding support)											
Exhange	City	CILI	Support per Line 2006	Support per Line 2007	Support per Line 2008	Support per Line 2009	Support per Line 2010	Support per Line 2011	Support per Line 2012	Support per Line 2013	Support per Line 2014*
DILLON	COPPER MOUNTAIN	CPMTCOMA	$11.07	$12.25	$12.25	$13.23	$13.23	$13.23	$13.23	$13.23	$13.23
CRAIG	CRAIG	CRAGCOMA	$12.30	$12.40	$12.40	$14.90	$14.90	$14.90	$14.90	$14.90	$14.90
CRESTED BUTTE	CRESTED BUTTE	CRBTCOMA	$10.65	$10.49	$10.49	$10.29	$10.29	$10.29	$10.29	$10.29	$10.29
CRIPPLE CREEK	CRIPPLE CREEK	CRCKCOMA	$36.59	$34.67	$34.67	$37.26	$37.26	$37.26	$37.26	$37.26	$37.26
CARBONDALE	CARBONDALE	CRDLCOMA	$8.56	$8.14	$8.14	$8.37	$8.37	$8.37	$8.37	$8.37	$8.37
CORTEZ	CORTEZ	CRTZCOMA	$9.15	$9.57	$9.57	$9.84	$9.84	$9.84	$9.84	$9.84	$9.84
CASTLE ROCK	CASTLE ROCK	CSRKCONM	$3.91	$4.61	$4.61	$4.80	$4.80	$4.80	$4.80	$4.80	$4.80
DEBEQUE	DEBEQUE	DBEQCONC	$123.23	$116.95	$116.95	$98.29	$98.29	$98.29	$98.29	$98.29	$98.29
DECKERS	DECKERS	DCKRCOMA	$106.87	$99.92	$99.92	$104.56	$104.56	$104.56	$104.56	$104.56	$104.56
DELTA	DELTA	DELTCOMA	$5.96	$5.51	$5.51	$5.78	$5.78	$5.78	$5.78	$5.78	$5.78
DILLON	DILLON	DLLNCOMA	$3.32	$4.08	$4.08	$4.53	$4.53	$4.53	$4.53	$4.53	$4.53
DEL NORTE	DEL NORTE	DLNRCOMA	$34.77	$36.57	$36.57	$38.34	$38.34	$38.34	$38.34	$38.34	$38.34
DENVER ZONE	CAPITAL HILL	DNVRCOCH	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
LITTLETON ZONE	COLUMBINE	DNVRCOCL	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
DENVER ZONE	CURTIS PARK	DNVRCOCP	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
LAFAYETTE-LOUISVILLE	COTTONWOOD	DNVRCOCW	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
LITTLETON ZONE	DRY CREEK	DNVRCODC	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
DENVER ZONE	DENVER EAST	DNVRCOEA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
DENVER ZONE	DENVER MAIN	DNVRCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
AURORA ZONE	MONTBELLO	DNVRCOMB	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
NORTHEAST ZONE	DENVER - NORTHEAST	DNVRCONE	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
DENVER ZONE	DENVER - NORTH	DNVRCONO	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
AURORA ZONE	DIA	DNVRCOOU	$16.94	$17.65	$17.65	$18.32	$18.32	$18.32	$18.32	$18.32	$18.32
DENVER ZONE	DENVER - SOUTHEAST	DNVRCOSH	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
SULLIVAN ZONE	SMOKY HILL	DNVRCOSE	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
SULLIVAN ZONE	SULLIVAN	DNVRCOSL	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
DENVER ZONE	DENVER - SOUTH	DNVRCOSO	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
SOUTHWEST ZONE	DENVER - SOUTHWEST	DNVRCOSW	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
DENVER ZONE	DENVER - WEST	DNVRCOWS	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
DURANGO	DURANGO	DURNCOMA	$2.77	$3.68	$3.68	$4.42	$4.42	$4.42	$4.42	$4.42	$4.42
EATON-AULT	EATON	EATNCOMA	$8.84	$8.55	$8.55	$8.65	$8.65	$8.65	$8.65	$8.65	$8.65
ELBERT	ELBERT	ELBRCOMA	$51.81	$49.28	$49.28	$50.17	$50.17	$50.17	$50.17	$50.17	$50.17
ELIZABETH	ELIZABETH	ELZBCO01	$13.28	$13.44	$13.44	$14.69	$14.69	$14.69	$14.69	$14.69	$14.69

Colorado High Cost Support per Residential Access Line per Month (CenturyLink Qwest exchanges and corresponding support)											
Exhange	City	CILI	Support per Line 2006	Support per Line 2007	Support per Line 2008	Support per Line 2009	Support per Line 2010	Support per Line 2011	Support per Line 2012	Support per Line 2013	Support per Line 2014*
LITTLETON ZONE	ABERDEEN	ENWDCOAB	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
ENGLEWOOD ZONE	ENGLEWOOD	ENWDCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
ERIE	ERIE	ERIECOMA	$11.18	$11.65	$11.65	$13.18	$13.18	$13.18	$13.18	$13.18	$13.18
ESTES PARK	ESTES PARK	ESPKCOMA	$4.39	$4.30	$4.30	$4.40	$4.40	$4.40	$4.40	$4.40	$4.40
EVERGREEN	EVERGREEN	EVRGCOMA	$2.12	$2.67	$2.67	$2.84	$2.84	$2.84	$2.84	$2.84	$2.84
FLORENCE	FLORENCE	FLRNCOMA	$20.34	$18.75	$18.75	$24.10	$24.10	$24.10	$24.10	$24.10	$24.10
COLORADO SPRINGS	FOUNTAIN	FONTCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
FT COLLINS	FT COLLINS	FTCLCOMA	$0.00	$1.18	$1.18	$0.24	$0.61	$0.61	$0.61	$0.61	$0.61
FREDRICK	FREDRICK	FRDRCOMA	$0.33	$44.03	$44.03	$0.61	$41.45	$41.45	$41.45	$41.45	$41.45
FAIRPLAY	FAIRPLAY	FRPLCOMA	$51.78	$3.96	$3.96	$41.45	$4.98	$4.98	$4.98	$4.98	$4.98
DILLON	FRISCO	FRSCCOMA	$5.29	$9.51	$9.51	$4.98	$9.92	$9.92	$9.92	$9.92	$9.92
FRASER	FRASER	FRSRCOMA	$9.46	$9.43	$9.43	$9.92	$11.17	$11.17	$11.17	$11.17	$11.17
FRUITA	FRUITA	FRUTCOMA	$10.43	$0.00	$0.00	$11.17	$0.00	$0.00	$0.00	$0.00	$0.00
FT COLLINS	HARMONY	FTCLCOHM	$0.00	$0.00	$0.00	$0.00	$0.24	$0.24	$0.24	$0.24	$0.24
FT LUPTON	FT LUPTON	FTLPCOMA	$3.08	$3.91	$3.91	$3.84	$3.84	$3.84	$3.84	$3.84	$3.84
FT MORGAN	FT MORGAN	FTMRCOMA	$1.79	$2.62	$2.62	$4.26	$4.26	$4.26	$4.26	$4.26	$4.26
GRAND JUNCTION	GRAND JUNCTION	GDJTCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
GRAND LAKE	GRAND LAKE	GDLKCOMA	$11.04	$11.28	$11.28	$13.36	$13.36	$13.36	$13.36	$13.36	$13.36
GILCREST	GILCREST	GLCRCOMA	$37.24	$37.73	$37.73	$39.80	$39.80	$39.80	$39.80	$39.80	$39.80
GOLDEN ZONE	GOLDEN	GLDNCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
GLENWOOD SPRINGS	GLENWOOD SPRINGS	GLSPCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
COLORADO SPRINGS	GREEN MOUNTAIN FALLS	GMFLCOMA	$15.27	$16.18	$16.18	$17.72	$17.72	$17.72	$17.72	$17.72	$17.72
GUNNISON	GUNNISON	GNSNCOMA	$22.80	$23.20	$23.20	$24.25	$24.25	$24.25	$24.25	$24.25	$24.25
GREELEY	PARKVIEW	GRELCOJC	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
GREELEY	GREELEY	GRELCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
GRANBY	GRANBY	GRNBCOMA	$20.17	$18.98	$18.98	$19.55	$19.55	$19.55	$19.55	$19.55	$19.55
GEORGETOWN	GEORGETOWN	GRTWCOMA	$17.58	$18.76	$18.76	$20.90	$20.90	$20.90	$20.90	$20.90	$20.90
HUDSON	HUDSON	HDSNCOMA	$30.31	$31.31	$31.31	$29.48	$29.48	$29.48	$29.48	$29.48	$29.48
HILLROSE	HILLROSE	HLRSCOMA	$124.41	$124.27	$124.27	$134.45	$134.45	$134.45	$134.45	$134.45	$134.45
HOT SULPHUR SPRINGS	HOT SULPHUR SPRINGS	HSSPCOMA	$60.02	$56.88	$56.88	$61.32	$61.32	$61.32	$61.32	$61.32	$61.32
HAYDEN	HAYDEN	HYDNCOMA	$54.68	$53.52	$53.52	$60.17	$60.17	$60.17	$60.17	$60.17	$60.17
IDAHO SPRINGS	IDAHO SPRINGS	IDSPCOMA	$19.37	$20.57	$20.57	$19.90	$19.90	$19.90	$19.90	$19.90	$19.90
JOHNSTON MILLIKEN	JOHNSTON-MILLIKEN	JHMLCOMA	$2.09	$2.15	$2.15	$1.84	$1.84	$1.84	$1.84	$1.84	$1.84
JULESBURG	JULESBURG	JLBGCOMA	$43.22	$44.44	$44.44	$45.64	$45.64	$45.64	$45.64	$45.64	$45.64
KIOWA	KIOWA	KIOWCOMA	$57.57	$57.29	$57.29	$62.07	$62.07	$62.07	$62.07	$62.07	$62.07

Colorado High Cost Support per Residential Access Line per Month											
(CenturyLink Qwest exchanges and corresponding support)											
Exhange	City	CILI	Support per Line 2006	Support per Line 2007	Support per Line 2008	Support per Line 2009	Support per Line 2010	Support per Line 2011	Support per Line 2012	Support per Line 2013	Support per Line 2014*
KEENESBURG	KEENESBURG	KNBGCOMA	$39.96	$38.77	$38.77	$39.47	$39.47	$39.47	$39.47	$39.47	$39.47
KREMMLING	KREMMLING	KRNGCOMA	$35.85	$33.90	$33.90	$36.01	$36.01	$36.01	$36.01	$36.01	$36.01
LEADVILLE	LEADVILLE	LDVLCOMA	$2.70	$3.53	$3.53	$4.55	$4.55	$4.55	$4.55	$4.55	$4.55
LIMON	LIMON	LIMNCOMA	$44.78	$47.36	$47.36	$51.19	$51.19	$51.19	$51.19	$51.19	$51.19
LOOKOUT MOUNTAIN	LOOKOUT MOUNTAIN	LKMTCOMA	$0.00	$0.00	$0.00	$0.32	$0.32	$0.32	$0.32	$0.32	$0.32
LAKEWOOD ZONE	LAKEWOOD DGTL CAP H	LKWDCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
LONGMONT	LONGMONT	LNMTCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
CASTLE ROCK	LARKSPUR	LRKSCONM	$13.95	$15.16	$15.16	$15.45	$15.45	$15.45	$15.45	$15.45	$15.45
LA SALLE	LA SALLE	LSLLCOMA	$30.99	$31.16	$31.16	$33.36	$33.36	$33.36	$33.36	$33.36	$33.36
LITTLETON ZONE	HIGHLANDS RANCH	LTTNCOHL	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
LITTLETON ZONE	LITTLETON	LTTNCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
LOVELAND	LOVELAND	LVLDCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
LYONS	LYONS	LYNSCOMA	$19.68	$19.06	$19.06	$17.89	$17.89	$17.89	$17.89	$17.89	$17.89
MEAD	MEAD	MEADCOMA	$17.69	$16.44	$16.44	$16.26	$16.26	$16.26	$16.26	$16.26	$16.26
MEEKER	MEEKER	MEKRCOMA	$73.10	$69.46	$69.46	$68.06	$68.06	$68.06	$68.06	$68.06	$68.06
MANCOS	MANCOS	MNCSCOMA	$55.39	$54.91	$54.91	$54.83	$54.83	$54.83	$54.83	$54.83	$54.83
COLORADO SPRINGS	MONUMENT	MNMTCOMA	$0.00	$0.16	$0.16	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
COLORADO SPRINGS	MANITOU SPRINGS	MNSPCOMA	$0.67	$1.78	$1.78	$2.24	$2.24	$2.24	$2.24	$2.24	$2.24
VAIL	MINTURN	MNTRCOMA	$36.28	$41.30	$41.30	$42.62	$42.62	$42.62	$42.62	$42.62	$42.62
MORRISON	MORRISON	MRSNCOMA	$10.10	$11.56	$11.56	$13.05	$13.05	$13.05	$13.05	$13.05	$13.05
MONTROSE	MONTROSE	MTRSCOMA	$4.24	$4.35	$4.35	$4.85	$4.85	$4.85	$4.85	$4.85	$4.85
MONTE VISTA	MONTE VISTA	MTVSCOMA	$10.30	$11.26	$11.26	$14.61	$14.61	$14.61	$14.61	$14.61	$14.61
CORTEZ	MESA VERDE	MVNPCOMA	$67.48	$93.53	$93.53	$79.76	$79.76	$79.76	$79.76	$79.76	$79.76
NEDERLAND	NEDERLAND	NDLDCOMA	$19.59	$19.30	$19.30	$19.93	$19.93	$19.93	$19.93	$19.93	$19.93
BROOMFIELD	NORTHGLENN	NGLNCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
LONGMONT	NIWOT	NIWTCOMA	$4.64	$4.62	$4.62	$4.05	$4.05	$4.05	$4.05	$4.05	$4.05
NEW CASTLE	NEW CASTLE	NWCSCOMA	$25.45	$23.03	$23.03	$21.67	$21.67	$21.67	$21.67	$21.67	$21.67
OAK CREEK	OAK CREEK	OKCKCOMA	$56.11	$51.29	$51.29	$51.85	$51.85	$51.85	$51.85	$51.85	$51.85
OLATHE	OLATHE	OLTHCOMA	$22.80	$21.13	$21.13	$21.00	$21.00	$21.00	$21.00	$21.00	$21.00
OURAY	OURAY	OURYCOMA	$29.18	$26.93	$26.93	$28.41	$28.41	$28.41	$28.41	$28.41	$28.41
JULESBURG	OVID	OVIDCOMA	$132.73	$131.20	$131.20	$137.40	$137.40	$137.40	$137.40	$137.40	$137.40
PARACHUTE	PARACHUTE	PACHC01	$15.61	$14.90	$14.90	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00
PALISADE	PALISADE	PLSDCOMA	$12.40	$15.26	$15.26	$18.78	$18.78	$18.78	$18.78	$18.78	$18.78
FLORENCE	PENROSE	PNRSCOMA	$16.67	$18.10	$18.10	$23.40	$23.40	$23.40	$23.40	$23.40	$23.40
PARKER	PARKER	PRKRCOMA	$0.00	$0.28	$0.28	$0.08	$0.08	$0.08	$0.08	$0.08	$0.08

Colorado High Cost Support per Residential Access Line per Month (CenturyLink Qwest exchanges and corresponding support)											
Exhange	City	CILI	Support per Line 2006	Support per Line 2007	Support per Line 2008	Support per Line 2009	Support per Line 2010	Support per Line 2011	Support per Line 2012	Support per Line 2013	Support per Line 2014*
PLATTEVILLE	PLATTEVILLE	PTVLCOMA	$17.61	$17.77	$17.77	$19.02	$19.02	$19.02	$19.02	$19.02	$19.02
PUEBLO	PUEBLO WEST	PUBLCO06	$0.44	$0.43	$0.43	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
PUEBLO	PUEBLO MAIN	PUBLCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
PUEBLO	SUNSET	PUBLOCOSU	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
PEYTON	PEYTON	PYTNCOMA	$31.21	$29.94	$29.94	$31.70	$31.70	$31.70	$31.70	$31.70	$31.70
RIDGEWAY	RIDGEWAY	RDGWCOMA	$28.73	$25.92	$25.92	$24.40	$24.40	$24.40	$24.40	$24.40	$24.40
RIFLE	RIFLE	RIFLCOMA	$5.70	$4.72	$4.72	$4.17	$4.17	$4.17	$4.17	$4.17	$4.17
SALIDA	SALIDA	SALDCOMA	$8.98	$8.95	$8.95	$10.48	$10.48	$10.48	$10.48	$10.48	$10.48
COLORADO SPRINGS	SECURITY MAIN	SCRTCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
DEL NORTE	SOUTH FORK	SFRKCOMA	$34.02	$31.31	$31.31	$31.25	$31.25	$31.25	$31.25	$31.25	$31.25
SILT	SILT	SILTCOMA	$25.09	$23.11	$23.11	$23.74	$23.74	$23.74	$23.74	$23.74	$23.74
SILVERTON	SILVERTON	SLTNCOMA	$34.85	$32.00	$32.00	$34.19	$34.19	$34.19	$34.19	$34.19	$34.19
ASPEN	SNOWMASS	SNMSCOMA	$3.75	$4.23	$4.23	$4.61	$4.61	$4.61	$4.61	$4.61	$4.61
STERLING	STERLING	STNGCOMA	$8.42	$9.42	$9.42	$12.94	$12.94	$12.94	$12.94	$12.94	$12.94
STEAMBOAT SPRINGS	STEAMBOAT SPRINGS	STSPCOMA	$5.31	$5.65	$5.65	$5.82	$5.82	$5.82	$5.82	$5.82	$5.82
BOULDER	TABLE MESA	TEMACOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
TELLURIDE	TELLURIDE	TLRDCOMA	$10.46	$10.77	$10.77	$10.83	$10.83	$10.83	$10.83	$10.83	$10.83
TRINIDAD	TRINIDAD	TRNDCOMA	$12.44	$12.41	$12.41	$12.43	$12.43	$12.43	$12.43	$12.43	$12.43
VAIL	VAIL	VAILCOMA	$0.36	$0.83	$0.83	$0.62	$0.62	$0.62	$0.62	$0.62	$0.62
PUEBLO	VINELAND	VNLDCOMA	$13.82	$15.29	$15.29	$16.75	$16.75	$16.75	$16.75	$16.75	$16.75
WARD	WARD	WARDCOMA	$42.83	$37.74	$37.74	$37.50	$37.50	$37.50	$37.50	$37.50	$37.50
COLORADO SPRINGS	WOODLAND PARK	WDPKCOMA	$6.54	$6.42	$6.42	$6.30	$6.30	$6.30	$6.30	$6.30	$6.30
FT COLLINS	WELLINGTON	WGTNCOMA	$18.01	$16.18	$16.18	$17.69	$17.69	$17.69	$17.69	$17.69	$17.69
WALSENBURG	WALSENBURG	WLBGCOMA	$25.37	$25.87	$25.87	$27.82	$27.82	$27.82	$27.82	$27.82	$27.82
WELDONA	WELDONA	WLDACONA	$68.12	$62.65	$62.65	$62.74	$62.74	$62.74	$62.74	$62.74	$62.74
ARVADA ZONE	WESTMINSTER	WMNSCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
WINDSOR	WINDSOR	WNDSCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
YAMPA	YAMPA	YAMPCOMA	$82.80	$85.13	$85.13	$89.37	$89.37	$89.37	$89.37	$89.37	$89.37
Statewide Average			$11.59	$10.86	$10.86	$11.43	$11.43	$11.43	$11.43	$11.43	$11.43
Residential Revenue Benchmarks			$19.02	$18.59	$18.59	$18.99	$18.99	$18.99	$18.99	$17.00	$17.00

* A Stipulation that would maintain support for 2014 at the 2013 level has not been finalized or ruled on by the Comission as of publication of this report.

Colorado High Cost Support per Business Access Line per Month											
(CenturyLink Qwest exchanges and corresponding support)											
Exhange	City	CILI	Support per Line 2006	Support per Line 2007	Support per Line 2008	Support per Line 2009	Support per Line 2010	Support per Line 2011	Support per Line 2012	Support per Line 2013	Support per Line 2014*
COLORADO SPRINGS	AIR FORCE ACADEMY	AFACCOMA	$0.00	$0.00	$0.00	$10.66	$10.66	$10.66	$10.66	$10.66	$10.66
AGUILAR	AGUILAR	AGLRCOMA	$64.59	$65.18	$65.18	$62.97	$62.97	$62.97	$62.97	$62.97	$62.97
ALAMOSA	ALAMOSA	ALMSCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
ALLENSPARK	ALLENS PARK	ALPKCOMA		$7.87	$7.87	$10.75	$10.75	$10.75	$10.75	$10.75	$10.75
ARVADA ZONE	ARVADA	ARVDCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
ASPEN	ASPEN	ASPECOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
EATON-AULT	AULT	AULTCOMA	$25.02	$25.65	$25.65	$28.70	$28.70	$28.70	$28.70	$28.70	$28.70
AURORA ZONE	AURORA	AURRCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
AURORA ZONE	AURORA	AURRCOMB	$4.39	$0.07	$0.07	$2.23	$2.23	$2.23	$2.23	$2.23	$2.23
PUEBLO	AVONDALE	AVDLCOMA	$37.93	$24.26	$24.26	$24.01	$24.01	$24.01	$24.01	$24.01	$24.01
VAIL	AVON	AVONCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
BAILEY	BAILEY	BALYCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
BRIGHTON	BRIGHTON	BITNCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
BOULDER	BOULDER	BLDRCOGB	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
BOULDER	BOULDER	BLDRCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
COLORADO SPRINGS	BLACKFOREST	BLFSCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
BUENA VISTA	BUENA VISTA	BNVSCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
BROOMFIELD	BROOMFIELD	BRFDCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
BRECKENRIDGE	BRECKENRIDGE	BRRGCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
BRUSH	BRUSH	BRSHCOMA	$0.00	$0.00	$0.00	$1.70	$1.70	$1.70	$1.70	$1.70	$1.70
BERTHOUD	BERTHOUD	BRTHCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
BASALT	BASALT	BSLTCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
BAYFIELD	BAYFIELD	BYFDCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
CANON CITY	CANON CITY	CACYCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
COAL CREEK	COAL CREEK	CCCNCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
GRAND JUNCTION	CLIFTON	CFTNCONM	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
CALHAN	CALHAN	CLHNCOMA	$38.91	$43.97	$43.97	$46.82	$46.82	$46.82	$46.82	$46.82	$46.82
COLORADO SPRINGS	COLORADO SPRINGS	CLSPCO32	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
COLORADO SPRINGS	COLORADO SPRINGS	CLSPCOEA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
COLORADO SPRINGS	COLORADO SPRINGS	CLSPCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
COLORADO SPRINGS	COLORADO SPRINGS	CLSPCOPV	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
COLORADO SPRINGS	COLORADO SPRINGS	CLSPCOSM	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
CENTRAL CITY	CENTRAL CITY	CNCYCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00

Exhange	City	CILI	Support per Line 2006	Support per Line 2007	Support per Line 2008	Support per Line 2009	Support per Line 2010	Support per Line 2011	Support per Line 2012	Support per Line 2013	Support per Line 2014*
Colorado High Cost Support per Business Access Line per Month (CenturyLink Qwest exchanges and corresponding support)											
DILLON	COPPER MOUNTAIN	CPMTCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
CRAIG	CRAIG	CRAGCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
CRESTED BUTTE	CRESTED BUTTE	CRBTCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
CRIPPLE CREEK	CRIPPLE CREEK	CRCKCOMA	$20.36	$15.91	$15.91	$18.80	$18.80	$18.80	$18.80	$18.80	$18.80
CARBONDALE	CARBONDALE	CRDLCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
CORTEZ	CORTEZ	CRTZCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
CASTLE ROCK	CASTLE ROCK	CSRKCONM	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
DEBEQUE	DEBEQUE	DBEQCONC	$102.69	$101.55	$101.55	$82.91	$82.91	$82.91	$82.91	$82.91	$82.91
DECKERS	DECKERS	DCKRCOMA	$79.22	$71.91	$71.91	$77.93	$77.93	$77.93	$77.93	$77.93	$77.93
DELTA	DELTA	DELTCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
DILLON	DILLON	DLLNCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
DEL NORTE	DEL NORTE	DLNRCOMA	$15.31	$18.97	$18.97	$22.83	$22.83	$22.83	$22.83	$22.83	$22.83
DENVER ZONE	DENVER	DNVRCOCH	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
LITTLETON ZONE	KEN CARYL RANCH	DNVRCOCL	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
DENVER ZONE	DENVER	DNVRCOCP	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
LAFAYETTE-LOUISVILLE	LAFAYETTE	DNVRCOCW	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
LITTLETON ZONE	GREENWOOD VILLAGE	DNVRCODC	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
DENVER ZONE	DENVER	DNVRCOEA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
DENVER ZONE	DENVER	DNVRCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
AURORA ZONE	DENVER	DNVRCOMB	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
NORTHEAST ZONE	COMMERCE CITY	DNVRCONE	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
DENVER ZONE	DENVER	DNVRCONO	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
AURORA ZONE	DENVER	DNVRCOOU	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
DENVER ZONE	DENVER	DNVRCOSE	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
SULLIVAN ZONE	AURORA	DNVRCOSE	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
SULLIVAN ZONE	AURORA	DNVRCOSL	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
DENVER ZONE	DENVER	DNVRCOSO	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
SOUTHWEST ZONE	LAKEWOOD	DNVRCOSW	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
DENVER ZONE	DENVER	DNVRCOWS	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
DURANGO	DURANGO	DURNCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
EATON-AULT	EATON	EATNCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
ELBERT	ELBERT	ELBRCOMA	$34.65	$30.70	$30.70	$33.42	$33.42	$33.42	$33.42	$33.42	$33.42
ELIZABETH	ELIZABETH	ELZBCO01	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00

Colorado High Cost Support per Business Access Line per Month (CenturyLink Qwest exchanges and corresponding support)											
Exhange	City	CILI	Support per Line 2006	Support per Line 2007	Support per Line 2008	Support per Line 2009	Support per Line 2010	Support per Line 2011	Support per Line 2012	Support per Line 2013	Support per Line 2014*
LITTLETON ZONE	ABERDEEN	ENWDCOAB	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
ENGLEWOOD ZONE	ENGLEWOOD	ENWDCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
ERIE	ERIE	ERIECOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
ESTES PARK	ESTES PARK	ESPKCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
EVERGREEN	EVERGREEN	EVRGCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
FLORENCE	FLORENCE	FLRNCOMA	$0.00	$0.00	$0.00	$4.41	$4.41	$4.41	$4.41	$4.41	$4.41
COLORADO SPRINGS	FOUNTAIN	FONTCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
FT COLLINS	FT COLLINS	FRCLCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
FREDRICK	FREDRICK	FRDRCOMA	$0.00	$19.18	$19.18	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
FAIRPLAY	FAIRPLAY	FRPLCOMA	$20.60	$0.00	$0.00	$19.38	$19.38	$19.38	$19.38	$19.38	$19.38
DILLON	FRISCO	FRSCCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
FRASER	FRASER	FRSRCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
FRUITA	FRUITA	FRUTCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
FT COLLINS	FT COLLINS	FTCLCOHM	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
FT LUPTON	FT LUPTON	FTLPCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
FT MORGAN	FT MORGAN	FTMRCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
GRAND JUNCTION	GRAND JUNCTION	GDJTCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
GRAND LAKE	GRAND LAKE	GDLKCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
GILCREST	GILCREST	GLCRCOMA	$23.15	$21.56	$21.56	$15.68	$15.68	$15.68	$15.68	$15.68	$15.68
GOLDEN ZONE	GOLDEN	GLDNCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
GLENWOOD SPRINGS	GLENWOOD SPRINGS	GLSPCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
COLORADO SPRINGS	GREEN MOUNTAIN FALLS	GMFLCOMA	$0.00	$0.00	$0.00	$0.97	$0.97	$0.97	$0.97	$0.97	$0.97
GUNNISON	GUNNISON	GNSNSOMA	$1.08	$4.13	$4.13	$5.49	$5.49	$5.49	$5.49	$5.49	$5.49
GREELEY	GREELEY	GRELCOJC	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
GREELEY	GREELEY	GRELCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
GRANBY	GRANBY	GRNBCOMA	$0.00	$0.00	$0.00	$2.59	$2.59	$2.59	$2.59	$2.59	$2.59
GEORGETOWN	GEORGETOWN	GRTWCOMA	$0.00	$0.09	$0.09	$2.93	$2.93	$2.93	$2.93	$2.93	$2.93
HUDSON	HUDSON	HDSNCOMA	$7.48	$13.81	$13.81	$13.33	$13.33	$13.33	$13.33	$13.33	$13.33
HILLROSE	HILLROSE	HLRSCOMA	$115.61	$105.83	$105.83	$117.42	$117.42	$117.42	$117.42	$117.42	$117.42
HOT SULPHUR SPRINGS	HOT SULPHUR SPRINGS	HSSPCOMA	$33.65	$36.26	$36.26	$43.64	$43.64	$43.64	$43.64	$43.64	$43.64
HAYDEN	HAYDEN	HYDNCOMA	$37.44	$38.49	$38.49	$43.94	$43.94	$43.94	$43.94	$43.94	$43.94
IDAHO SPRINGS	IDAHO SPRINGS	IDSPCOMA	$0.00	$2.28	$2.28	$2.12	$2.12	$2.12	$2.12	$2.12	$2.12
JOHNSTON MILLIKEN	JOHNSTON MILLIKEN	JHMLCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
JULESBURG	JULESBURG	JLBGCOMA	$26.24	$29.51	$29.51	$30.87	$30.87	$30.87	$30.87	$30.87	$30.87
KIOWA	KIOWA	KIOWCOMA	$38.43	$23.94	$23.94	$25.68	$25.68	$25.68	$25.68	$25.68	$25.68

Colorado High Cost Support per Business Access Line per Month											
(CenturyLink Qwest exchanges and corresponding support)											
Exhange	City	CILI	Support per Line 2006	Support per Line 2007	Support per Line 2008	Support per Line 2009	Support per Line 2010	Support per Line 2011	Support per Line 2012	Support per Line 2013	Support per Line 2014*
KEENESBURG	KEENESBURG	KNBGCOMA	$24.23	$23.44	$23.44	$24.01	$24.01	$24.01	$24.01	$24.01	$24.01
KREMMLING	KREMMLING	KRNGCOMA	$15.49	$15.53	$15.53	$18.06	$18.06	$18.06	$18.06	$18.06	$18.06
LEADVILLE	LEADVILLE	LDVLCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
LIMON	LIMON	LIMNCOMA	$26.58	$30.59	$30.59	$37.33	$37.33	$37.33	$37.33	$37.33	$37.33
LOOKOUT MOUNTAIN	JEFFERSON COUNTY	LKMTCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
LAKEWOOD ZONE	LAKEWOOD	LKWDCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
LONGMONT	LONGMONT	LNMTCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
CASTLE ROCK	LARKSPUR	LRKSCONM	$0.00	$0.00	$0.00	$0.15	$0.15	$0.15	$0.15	$0.15	$0.15
LA SALLE	LA SALLE	LSLLCOMA	$13.61	$14.01	$14.01	$15.91	$15.91	$15.91	$15.91	$15.91	$15.91
LITTLETON ZONE	LITTLETON	LTTNCOHL	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
LITTLETON ZONE	LITTLETON	LTTNCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
LOVELAND	LOVELAND	LVLDCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
LYONS	LYONS	LYNSCOMA	$0.00	$0.00	$0.00	$0.57	$0.57	$0.57	$0.57	$0.57	$0.57
MEAD	MEAD	MEADCOMA	$0.00	$1.16	$1.16	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
MEEKER	MEEKER	MEKRCOMA	$53.74	$52.30	$52.30	$52.68	$52.68	$52.68	$52.68	$52.68	$52.68
MANCOS	MANCOS	MNCSCOMA	$35.80	$37.57	$37.57	$37.57	$37.57	$37.57	$37.57	$37.57	$37.57
COLORADO SPRINGS	MONUMENT	MNMTCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
COLORADO SPRINGS	MANITOU SPRINGS	MNSPCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
VAIL	MINTURN	MNTRCOMA	$20.71	$27.75	$27.75	$27.59	$27.59	$27.59	$27.59	$27.59	$27.59
MORRISON	MORRISON	MRSNCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
MONTROSE	MONTROSE	MTRSCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
MONTE VISTA	MONTE VISTA	MTVSCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
CORTEZ	MESA VERDE	MVNPCOMA	$50.15	$79.38	$79.38	$67.32	$67.32	$67.32	$67.32	$67.32	$67.32
NEDERLAND	NEDERLAND	NDLDCOMA	$0.70	$2.38	$2.38	$2.40	$2.40	$2.40	$2.40	$2.40	$2.40
BROOMFIELD	NORTHGLENN	NGLNCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
LONGMONT	NIWOT	NIWTCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
NEW CASTLE	NEW CASTLE	NWCSCOMA	$7.73	$7.37	$7.37	$6.75	$6.75	$6.75	$6.75	$6.75	$6.75
OAK CREEK	OAK CREEK	OKCKCOMA	$37.19	$31.49	$31.49	$33.89	$33.89	$33.89	$33.89	$33.89	$33.89
OLATHE	OLATHE	OLTHCOMA	$3.53	$2.96	$2.96	$4.23	$4.23	$4.23	$4.23	$4.23	$4.23
OURAY	OURAY	OURYCOMA	$8.52	$9.90	$9.90	$9.93	$9.93	$9.93	$9.93	$9.93	$9.93
JULESBURG	OVID	OVIDCOMA	$115.48	$111.67	$111.67	$118.03	$118.03	$118.03	$118.03	$118.03	$118.03
PARACHUTE	PARACHUTE	PACHC01	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
PALISADE	PALISADE	PLSDCOMA	$0.00	$0.00	$0.00	$3.43	$3.43	$3.43	$3.43	$3.43	$3.43
FLORENCE	PENROSE	PNRSCOMA	$0.00	$3.02	$3.02	$7.49	$7.49	$7.49	$7.49	$7.49	$7.49
PARKER	PARKER	PRKRCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00

Colorado High Cost Support per Business Access Line per Month (CenturyLink Qwest exchanges and corresponding support)											
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PLATTEVILLE	PLATTEVILLE	PTVLCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
PUEBLO	PUEBLO	PUBLCO06	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
PUEBLO	PUEBLO	PUBLCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
PUEBLO	PUEBLO	PUBLOCOSU	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
PEYTON	PEYTON	PYTNCOMA	$14.28	$13.83	$13.83	$16.92	$16.92	$16.92	$16.92	$16.92	$16.92
RIDGEWAY	RIDGEWAY	RDGWCOMA	$8.81	$7.41	$7.41	$7.58	$7.58	$7.58	$7.58	$7.58	$7.58
RIFLE	RIFLE	RIFLCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
SALIDA	SALIDA	SALDCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
COLORADO SPRINGS	SECURITY	SCRTCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
DEL NORTE	SOUTH FORK	SFRKCOMA	$9.60	$9.59	$9.59	$10.02	$10.02	$10.02	$10.02	$10.02	$10.02
SILT	SILT	SILTCOMA	$6.69	$6.51	$6.51	$7.04	$7.04	$7.04	$7.04	$7.04	$7.04
SILVERTON	SILVERTON	SLTNCOMA	$14.09	$14.33	$14.33	$14.71	$14.71	$14.71	$14.71	$14.71	$14.71
ASPEN	SNOWMASS	SNMSCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
STERLING	STERLING	STNGCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
STEAMBOAT SPRINGS	STEAMBOAT SPRINGS	STSPCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
BOULDER	BOULDER	TEMACOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
TELLURIDE	TELLURIDE	TLRDCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
TRINIDAD	TRINIDAD	TRNDCOMA	$1.89	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
VAIL	VAIL	VAILCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
PUEBLO	VINELAND	VNLDCOMA	$0.00	$0.00	$0.00	$2.69	$2.69	$2.69	$2.69	$2.69	$2.69
WARD	WARD	WARDCOMA	$10.80	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
COLORADO SPRINGS	WOODLAND PARK	WDPKCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
FT COLLINS	WELLINGTON	WGTNCOMA	$1.97	$2.39	$2.39	$4.13	$4.13	$4.13	$4.13	$4.13	$4.13
WALSENBURG	WALSENBURG	WLBGCOMA	$2.73	$7.28	$7.28	$11.05	$11.05	$11.05	$11.05	$11.05	$11.05
WELDONA	WELDONA	WLDACONA	$51.27	$43.32	$43.32	$45.40	$45.40	$45.40	$45.40	$45.40	$45.40
ARVADA ZONE	WESTMINSTER	WMNSCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
WINDSOR	WINDSOR	WNDSCOMA	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
YAMPA	YAMPA	YAMPCOMA	$62.08	$65.43	$65.43	$72.56	$72.56	$72.56	$72.56	$72.56	$72.56
	Statewide Average		$16.97	$17.76	$17.76	$15.99	$15.99	$15.99	$15.99	$15.99	$15.99
	Business Revenue Benchmarks*		$38.45	$36.34	$36.34	$34.79	$34.79	$34.79	$34.79	$35.02	$35.02

* A Stipulation that would maintain support for 2014 at the 2013 level has not been finalized or ruled on by the Comission as of publication of this report.