

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

TELECOMMUNICATIONS DIVISION

RESOLUTION T-15987

January 13, 1997

R E S O L U T I O N

RESOLUTION T-15987. EIGHTEEN SMALL AND MID-SIZE LOCAL EXCHANGE TELEPHONE COMPANIES. ORDER REVISING INTRASTATE HIGH COST FUND DRAWS, INTRALATA BILLING SURCHARGES/SURCREDITS, AND HIGH COST FUND SURCHARGE COLLECTED BY ALL TELECOMMUNICATIONS CARRIERS.

BY ADVICE

LETTER NO.	FILED BY	DATE FILED
182	CALAVERAS TELEPHONE COMPANY (Calaveras)	11/01/96
202	CALIFORNIA-OREGON TELEPHONE CO. (Cal-Oregon)	11/01/96
13	CITIZENS TELECOMMUNICATIONS COMPANY OF THE GOLDEN STATE (Golden State)	11/01/96
12	CITIZENS TELECOMMUNICATIONS COMPANY OF TUOLUMNE (Tuolumne)	11/01/96
202	DUCOR TELEPHONE COMPANY (Ducor)	11/01/96
254	EVANS TELEPHONE COMPANY (Evans)	11/01/96
168	FORESTHILL TELEPHONE COMPANY (Foresthill)	11/01/96
426	GTE WEST COAST INCORPORATED (GTE West Coast)	11/01/96
171	HAPPY VALLEY TELEPHONE COMPANY (Happy Valley)	11/01/96
153	HORNITOS TELEPHONE COMPANY (Hornitos)	11/01/96
235	KERMAN TELEPHONE COMPANY (Kerman)	11/01/96
120	PINNACLES TELEPHONE COMPANY (Pinnacles)	11/04/96
229	THE PONDEROSA TELEPHONE CO. (Ponderosa)	10/31/96
370	ROSEVILLE TELEPHONE COMPANY (Roseville)	10/31/96
197	SIERRA TELEPHONE CO., INC. (Sierra)	10/31/96
234	THE SISKIYOU TELEPHONE COMPANY (Siskiyou)	11/04/96
214	THE VOLCANO TELEPHONE COMPANY (Volcano)	11/04/96
72	WINTERHAVEN TELEPHONE COMPANY (Winterhaven)	11/01/96

SUMMARY

The determination of the California High Cost Fund-A (CHCF-A) requirements and fund draws for 1997 is deferred to the seventeen small local exchange telephone company (LEC) general rate case applications and advice letters currently pending before the Commission. The protest by AT&T Communications of California, Inc. (AT&T) of Foresthill's Advice Letter 168 has merit and is granted. We have made adjustments to correct errors in some companies' calculations of their 1997 CHCF-A net requirements. The CHCF-A all end-user surcharge is reduced to 0% effective February 1, 1997.

BACKGROUND

The recent decision in the Universal Service Proceeding, D.96-10-066, created a new California High Cost Fund-B (CHCF-B) for the large and mid-size LECs in California. This decision stated that "The seventeen smaller LECs shall not be subject to the rules applicable to the CHCF-B fund. Instead, the seventeen smaller LECs shall continue to be eligible for universal service support under the existing California High Cost Fund. We shall refer to the existing fund as the CHCF-A." To minimize confusion, in this resolution we refer to the fund previously known as the California High Cost Fund by the name California High Cost Fund-A or the acronym "CHCF-A".

The CHCF-A provides a source of supplemental revenue to small and mid-size LECs whose basic exchange access line service rates would otherwise need to be increased to levels that would threaten universal service, as a result of toll and access rate changes and their effect on these LECs' settlement pool revenues. By D.88-07-022 dated July 8, 1988, the Commission adopted the intrastate CHCF-A mechanism. Appendix B of D.88-07-022 requires each local exchange company to file, by October 1 of each year, an advice letter that both proposes a rate design and requests CHCF-A support, if needed, to offset the forecasted net increase or decrease in its settlement revenues resulting from regulatory changes ordered by the Commission and the Federal Communications Commission (FCC). Appendix A of D.91-09-042 sets forth the CHCF-A recovery guidelines:

Utilities shall be eligible for support from the fund limited to the amount[s] which are forecasted to result in earnings not to exceed authorized intrastate rates of return or to the current funding level amount for the year for which CHCF is being requested, whichever amount is lower. The forecasted intrastate rate of return shall be developed using annualized earnings based on at least seven months of recorded financial data for the year in which the advice letter is filed. Funding levels from past years shall be subject to this limitation in each succeeding year. For purposes of determining amounts for which a utility may be eligible, utilities which do not have an authorized intrastate rate of return shall apply the highest intrastate rate of return authorized by the Commission for a local exchange company.

To recover a net positive revenue requirement, a LEC must file a "means test" with its advice letter. Decision 94-09-065 reinstated the funding of the CHCF-A at 100% for 1995, 1996, and 1997. No LEC was eligible to receive its 1995 authorized CHCF-A until it filed an application for a General Rate Case (GRC), at which time it began drawing from the fund. Decision 94-09-065 did not change the means test requirement established in D.91-09-042.

### 1997 CHCF-A ADVICE LETTER FILINGS

An extension of this year's October 1 deadline for filing CHCF-A advice letters was requested by Mark Schreiber (Schreiber) on behalf of nine LECs, by Jeffrey Beck (Beck) on behalf of six LECs, by Robert Gloistein on behalf of Contel, and by Barbara Snider on behalf of Citizens and Tuolumne, in order to provide adequate time after receipt of corrected data from Pacific Bell (Pacific) to prepare their clients' CHCF-A advice letters. The requests for an extension were granted, and the filing deadline was extended to November 1, 1996.

Eighteen LECs filed their advice letters as required by Appendix B of D.88-07-022 on various dates in October and November of 1996, setting forth their 1997 net settlements effects, requests for 1997 CHCF-A support and/or revisions to their intraLATA billing surcredits.

Of the eighteen LECs that filed advice letters, one (Kerman) requested to decrease its intraLATA billing surcredit, and three LECs (Foresthill, GTE West Coast, and Roseville) requested to draw funds from the CHCF-A. Contel of California Inc. did not file a CHCF-A advice letter this year, presumably because D.96-10-066 made Contel no longer eligible for the CHCF-A effective February 1, 1997. The areas formerly served in California by Alltel-CP National Corporation and Alltel-Tuolumne Telephone Company are now served by Citizens Telecommunications Company of The Golden State and Citizens Telecommunications Company of Tuolumne, respectively, each of which filed CHCF-A advice letters.

### NOTICE/PROTESTS

Public notice of the LECs' CHCF-A advice letters appeared in the Commission's Daily Calendar throughout November and December, 1996.

The Telecommunications Division (TD) received a protest from AT&T regarding Foresthill's CHCF-A advice letter filing.

AT&T points out that the worksheet accompanying Foresthill's Advice Letter fails to use as its starting point the negative CHCF-A revenue requirement adopted for Foresthill by the Commission in its Resolution T-15826, which determined the LECs' 1996 CHCF-A revenue requirements and draws. AT&T requests that, at a minimum, the Commission suspend Foresthill's 1997 CHCF-A filing until such time as Foresthill submits a CHCF-A worksheet which is in compliance with Commission requirements. No response to AT&T's protest has been received from Foresthill.

### DISCUSSION

TD believes that AT&T is correct in asserting that the correct starting point for Foresthill's calculation of its 1997 CHCF-A revenue requirement is Foresthill's 1996 CHCF-A revenue requirement. That is the normal case, and Foresthill has not responded to AT&T's protest indicating any reason why the normal case should not apply here. For this reason TD staff has asked

Foresthill, in a December 13 data request to the accountant who filed Foresthill's CHCF-A advice letter, to supplement Foresthill's 1997 CHCF-A advice letter amending its calculation of Foresthill's 1997 CHCF-A requirement by using its 1996 CHCF-A requirement as its starting point. In the same data request, TD staff has asked Foresthill's accountant to clarify other points about Foresthill's 1997 CHCF-A advice letter and to provide an analysis of Foresthill's memorandum account entries. Until TD staff receives further clarification from Foresthill regarding its memorandum account entries, TD is unable to accurately determine Foresthill's 1997 CHCF-A requirement and its correct billing surcredit. TD staff recommends deferring action on Foresthill's CHCF-A advice letter and leaving Foresthill's current surcredit in place until it receives further information regarding these items from Foresthill.

TD staff also verbally requested a clarification from Sierra as to why it did not reverse out the non-recurring impacts of two items<sup>1</sup> that it properly showed on its 1996 CHCF-A worksheet, and should have reversed on this year's filing. The combined impact of these two items would be to increase Sierra's 1997 CHCF-A requirement by \$710,033. TD staff has made these two adjustments to Sierra's 1997 CHCF-A requirement indicated in Appendix A.

TD staff has found the same error in GTE West Coast's calculation of its 1997 CHCF-A requirement. The combined impact of these two items would be to increase GTE West Coast's 1997 CHCF-A requirement by \$27,586. TD staff has made these two adjustments to GTE West Coast's 1997 CHCF-A requirement indicated in Appendix A, as well as using GTE West Coast's 1996 CHCF-A requirement of \$41 instead of \$0, as the starting point for calculating its 1997 CHCF-A requirement.

Roseville stated in its CHCF-A advice letter that the amount of its CHCF-A requirement for 1997 may change from that which it filed in its October 31, 1996 advice letter. Its CHCF-A requirement may change, Roseville stated, both as a result of the Commission's recent decision in the Universal Service proceeding which adopted a new fund, the CHCF-B, and as a result of the pending Decision on Roseville's GRC (A.95-05-030). TD staff believes that the decision rendered December 20, 1996 in Roseville's GRC, D.96-12-074, supersedes the far less rigorous filing made to request CHCF-A support. In that decision, the Commission set a new authorized rate of return for Roseville, and found that the adopted rates offered Roseville a fair opportunity to earn this authorized rate of return. The Commission did not include any receipts from CHCF-A in Roseville's projected revenue in arriving at the rates it adopted for Roseville to achieve this rate of return. Thus, any amount of CHCF-A support the Commission would authorize now would increase Roseville's earnings to a level

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<sup>1</sup> The two items are the 1992-1995 property tax settlement and the 1995 account 2004 and 2003 merge.

above the last authorized rate of return for Roseville; and would therefore be contrary to the CHCF-A rules spelled out in Appendix A of D.91-09-042 (quoted on page 2 of this resolution). Additionally, the recent decision in the Universal Service Proceeding, D.96-10-066, created a new California High Cost Fund-B (CHCF-B) for the large and mid-size LECs in California. This decision stated, in Ordering Paragraph 8.a, "The funding mechanism to support the high cost areas within the service areas of GTEC, Pacific, CTCC, Contel, and Roseville, shall be known as the California High Cost Fund-B (CHCF-B).", and in Ordering Paragraph 9, "The seventeen smaller LECs, whose names appear on Attachment A of Appendix B, shall continue to be eligible to receive universal service support through the existing California High Cost Fund (CHCF-A)". The clear implication of these two ordering paragraphs is that Roseville is no longer eligible for CHCF-A funding once CHCF-B funding becomes available, which is ordered to occur effective February 1, 1997. For these reasons, TD staff recommends denying Roseville's request for CHCF-A support.

Kerman requested to reduce its surcredit from the current (1.42)% to (.40)% as a result of settlements impacts that increased Kerman's CHCF-A requirement from \$(36,076) to \$(10,251). TD staff concurs in Kerman's settlements impacts figures, but for the reasons discussed below regarding the pendency of GRC reviews of all the small LECs, TD staff recommends deferring action on Kerman's requested surcredit rate decrease until further order in its GRC.

GRCs are pending for all seventeen LECs still eligible for CHCF-A support. In Decision Nos. 96-05-026, 96-05-027, 96-05-028, 96-05-029, and 96-05-030, the Commission made rates for the five small LECs that filed GRC applications<sup>2</sup> by December 31, 1995 subject to refund effective January 1, 1997, and adopted a procedural schedule that calls for a final Commission decision in the five GRC applications by February 28, 1997. Similarly, in Resolution T-15970, dated November 26, 1996, the Commission made the rates of the twelve small LECs that filed their GRCs by advice letter subject to refund or credit effective January 1, 1997 pending final Commission action on their individual GRC advice letter filings.

TD staff believes that these GRC proceedings are superior forums for determining the actual requirements, if any, for funding of these LECs' revenue requirements during 1997 from sources other than these LECs' own ratepayers, such as the CHCF-A. The CHCF-A mechanism is a convenient shortcut method of supplementing small LECs' revenues for impacts of settlements changes and CPUC or FCC actions on their revenues short of conducting more thorough general rate reviews on all seventeen small LECs each year. However, the CHCF-A review process cannot begin to examine the

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<sup>2</sup> These five small LECs are Calaveras, Cal-Oregon, Ducor, Foresthill, and Sierra.

LECs' revenues and expenses in the level of detail afforded by a general rate review.

Because the Commission has made the rates of all seventeen small LECs that are still eligible for CHCF-A support subject to refund or credit effective January 1, 1997 pending final Commission action on their individual GRC filings, the Commission has eliminated the likelihood that any of these LECs will not be able to earn its authorized rate of return during 1997. If the Commission finds, in any of these pending GRCs, that any of the small LECs would require unreasonably high residential basic exchange rates in order to earn its authorized rate of return, then the Commission can authorize that LEC to draw from the CHCF-A that amount necessary to fund the gap between the LEC's 1997 revenue requirement, as determined in the LEC's pending GRC, and the revenues projected to result from the rates that the Commission orders in the LEC's GRC. The CHCF-A has sufficient funds currently to meet all needs for funds from the CHCF-A likely to be found in these GRCs.

For these reasons, TD staff recommends deferring the determination of 1997 CHCF-A requirements and fund draws pending the resolution of the 17 small LECs' GRCs. Since the GRCs are all predicated on 1997 test year revenue and expense estimates, it would be reasonable to similarly make any 1997 CHCF-A fund draws found to be necessary in the GRCs retroactive to January 1, 1997.

The TD has verified the various numbers in the CHCF-A advice letter filings, and found that, except as noted herein, the figures submitted in the advice letters correctly represent the 1997 CHCF-A requirements of the LECs.

After elimination of Roseville's requested CHCF-A draw, for the reasons cited above, the remaining total 1997 CHCF-A draw requested is about \$2.2 million, down 92% from the authorized 1996 total draw. The estimated 1997 billing base for the CHCF-A surcharge has remained roughly constant from last year's estimated billing base of \$12.3 billion, as noted in Resolution No. T-15984 establishing the 1997 Universal Lifeline Telephone Service (ULTS) surcharge rate. The combination of these two factors, and the existence of a CHCF-A fund surplus carried over from 1996 allows us to reduce the CHCF-A surcharge for 1997 from 0.27% to 0.00%. We order herein all certificated telecommunications providers in California to file advice letters to reduce their CHCF-A surcharges from the current 0.27% rate to 0.00% effective February 1, 1997.

Changes in the CHCF-A Surcharge rate usually are effective as of January 1. This year we are delaying the effective date of the new surcharge rate, to be consistent with the new surcharge programs, California High Cost Fund-B and the Teleconnect Fund, that become effective on February 1, 1997. The delay in the effective date will allow companies who must collect surcharges to make only one change in their billing system programs as of February 1, 1997 instead of two such changes. It will also allow the Commission to issue a new Combined California PUC Telephone Surcharge Transmittal which will include all current Commission

Surcharges. A copy of the revised form is attached as Attachment 1 of Commission Resolution T-15984, which sets the Universal Lifeline Telephone Service surcharge rate effective February 1, 1997.

In Resolution T-15558 (June 8, 1994) we waived the notice requirements of General Order 96-A, Section III, G.1., the requirement to furnish competing utilities either public or private with copies of related tariff sheets. We did so because it did not appear to be in the public's interest for each utility to send and receive over one hundred notices advising them of a regulation change they already know about. Since that time nothing has happened to change our opinion, so we will again waive this notice requirement, for tariff changes that comply with the CHCF-A surcharge rate change portion of this resolution.

### FINDINGS OF FACT

1. Ordering Paragraph 64 of D.88-07-022 adopted and directed the implementation of the intrastate CHCF-A described in Appendix B of that decision.
2. Full funding of the CHCF-A for 1995, 1996, and 1997 was ordered by D.94-09-065, replacing the waterfall provisions delineated in Section D of D.88-07-022. LECs are eligible to begin drawing from the fund at the time they file a GRC application.
3. The means test provisions in D.91-05-016 as modified by D.91-09-042 are now in effect.
4. The advice letter filings by the LECs listed in Appendix A of this Resolution are compliance filings required by Appendix B of D.88-07-022.
5. A protest to Foresthill's CHCF-A advice letter filing was received from AT&T. AT&T's protest has merit.
6. Foresthill has not justified eliminating its current 28.63% surcredit.
7. Roseville's recently concluded GRC has established rates that allow it a reasonable opportunity to earn its authorized rate of return during 1997, and eliminates the need for Roseville to receive any further funds from the CHCF-A.
8. A final Commission decision in the five GRC applications cited on page 5 is expected during the first quarter of 1997.
9. Resolutions for the twelve small LEC GRCs filed by advice letter are expected during the first quarter of 1997.
10. The five small LECs that have GRC applications pending have had their rates made subject to refund effective January 1, 1997.

11. The twelve small LECs that have GRC advice letters pending have had their rates made subject to refund/recovery effective January 1, 1997.

12. Because the five small LECs that have GRC applications pending have had their rates made subject to refund but not recovery effective January 1, 1997, it is reasonable to make any 1997 CHCF-A fund draws found to be necessary in these GRCs retroactive to January 1, 1997.

13. It is reasonable to defer the determination of 1997 CHCF-A requirements and fund draws to the pending GRCs of the seventeen small LECs.

14. D.94-09-065 ordered the CHCF-A to be funded by an all end-user surcharge, and set the surcharge rate for 1996 at 0.5%. Last year's CHCF-A Resolution, T-15826, reduced the CHCF-A surcharge to 0.27%.

15. Because of decreased requests for CHCF-A funding for 1996, no projected change from \$12.3 billion in the surcharge billing base, and a fund surplus carried over from 1996, the CHCF-A surcharge can be reduced to 0.00% effective February 1, 1997.

16. The rates, charges and conditions authorized in this Resolution are just and reasonable.

17. It is neither in the public's interest nor in the telecommunications utilities' interest to require all utilities to notice all other utilities of a Commission order of which they are all aware.

**THEREFORE, IT IS ORDERED that:**

1. Roseville Telephone Company's request for 1997 funding from the California High Cost Fund-A (CHCF-A) is denied, and its advice letter No. 353 is rejected.

2. Foresthill Telephone Company is ordered to continue its 28.63% surcredit until further order of the Commission, and to make the appropriate tariff change filing to accomplish this.

3. Kerman Telephone Company is ordered to continue its 1.42% surcredit until further order of the Commission.

4. We defer determination of 1997 CHCF-A requirements, or fund draws, or both, requested in Calaveras Telephone Company's advice letter No. 182, California-Oregon Telephone Company's advice letter No. 202, Ducor Telephone Company's advice letter No. 202, Foresthill Telephone Company's advice letter No. 164, and Sierra Telephone Company, Inc.'s advice letter No. 197 to these companies' respective GRC Applications No. 95-12-075, 95-12-073, 95-12-076, 95-12-078, and 95-12-077. We instruct the assigned Administrative Law Judge to take into consideration any needs of these companies for 1997 CHCF-A draws necessary to meet the



revenue requirement needs of these companies, in conformance with Public Utilities Code Section 739.3.

5. We defer determination of 1997 CHCF-A requirements, or fund draws, or both, requested in Citizens Telecommunications Company of the Golden State's advice letter No. 13, Citizens Telecommunications Company of Tuolumne's advice letter No. 12, Evans Telephone Company's advice letter No. 254, GTE West Coast's advice letter No. 426, Happy Valley Telephone Company's advice letter No. 171, Hornitos Telephone Company's advice letter No. 153, Kerman Telephone Company's advice letter No. 235, Pinnacles Telephone Company's advice letter No. 120, The Ponderosa Telephone Company's advice letter No. 229, The Siskiyou Telephone Company's advice letter No. 234, The Volcano Telephone Company's advice letter 214, and Winterhaven Telephone Company's advice letter No. 72 to these companies' respective GRC advice letters No. 7, 7, 247, 408, 158, 146, 226, 115, 220, 225, 206, and 64. We instruct the assigned Telecommunications Division staff to take into consideration any needs of these companies for 1997 CHCF-A draws necessary to meet the revenue requirement needs of these companies, in conformance with Public Utilities Code Section 739.3.

6. All Local Exchange Companies, Interexchange Carriers, Cellular carriers and other certificated companies that are subject to the collection of CHCF-A surcharges shall reduce the CHCF-A surcharge rate from 0.27% to 0.00% effective February 1, 1997.

7. The 0.00% CHCF-A surcharge rate shall be effective for all billings processed on or after February 1, 1997 and continue until changed by the Commission.

8. All telecommunications utilities subject to the CHCF-A surcharge shall file revised tariff schedules to implement this surcharge rate change in accordance with the provisions of G.O. 96-A on or before January 25, 1997 which shall be effective on February 1, 1997.

9. The CHCF-A surcharge shall be identified on the subscriber's bill in a manner consistent with the findings of D.96-10-066 and the December 13, 1996 Ruling of Administrative Law Judge John S. Wong in R.95-01-020. Specifically, the CHCF-A and CHCF-B surcharges may be combined on one line item on a customer's bill. Whether combined on one line or shown on separate lines, the bill should list the CHCF-A and CHCF-B surcharges by the funds' full names or by their abbreviations. Since the CHCF-A surcharge is reduced to 0.00% effective 2/1/97, it is permissible for carriers to omit mentioning the CHCF-A surcharge on customers' bills until such time as the CHCF-A is reinstated at a non-zero rate.

10. All telecommunications companies are granted an exemption from the noticing requirement of General Order 96-A, Section III, G.1 for this filing only.

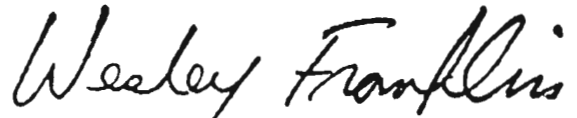
11. All telecommunications companies subject to the CHCF-A surcharge, the Universal Lifeline Telephone Service surcharge, and

the Deaf Equipment Acquisition Fund surcharge, are ordered to use the "Combined California PUC Telephone Surcharge Transmittal" form to compute, report, and transmit all three of these surcharges, beginning February 1, 1997. A copy of the revised form is attached as Attachment 1 of Commission Resolution T-15984, which sets the Universal Lifeline Telephone Service surcharge rate effective February 1, 1997.

12. The TD staff is directed to mail a copy of this resolution to all telephone utilities subject to the CHCF-A surcharge.

The effective date of this Resolution is today.

I certify that this Resolution was adopted by the Public Utilities Commission at its regular meeting on January 13, 1997. The following Commissioners approved it:



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WESLEY M. FRANKLIN  
Executive Director

P. GREGORY CONLON  
President  
JESSIE J. KNIGHT, Jr.  
HENRY M. DUQUE  
JOSIAH L. NEEPER  
RICHARD A. BILAS  
Commissioners

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1997 CHCF-A

Local Exchange Company	Advice Letter No.	Reported Gross CHCF-A Requirement	Adjusted Gross CHCF-A Requirement*	Contrib. From Local Rates	Net 1997 CHCF-A Requirement	Requested CHCF-A Draw *	Approved CHCF-A Draw	Adopted Co.-specific Surcharge
1 Calaveras	182	\$172,954	\$172,954	\$0	\$172,954	\$0	\$0	
2 Cal-Oregon	202	180,605	180,605	0	180,605	0	0	
3 Citizens Tel.--Golden State	13	1,801,563	1,801,563	0	1,801,563	0	0	
4 Citizens Tel. of Tuolumne	12	1,004,387	1,004,387	0	1,004,387	0	0	
5 Ducor	202	102,093	102,093	0	102,093	0	0	
6 Evans	254	750,355	750,355	0	750,355	0	0	
7 Foresthill	168	99,705	(89,032)	0	(89,032)	0	0	-28.63%
8 GTE West Coast	426	2,037,607	2,065,234	0	2,065,234	2,065,234	0	
9 Happy Valley	171	664,973	664,973	0	664,973	0	0	
10 Hornitos	153	112,219	112,219	0	112,219	0	0	
11 Kerman	235	(10,251)	(10,251)	0	(10,251)	0	0	-1.42%
12 Pinnacles	120	135,304	135,304	0	135,304	0	0	
13 Ponderosa	229	1,645,128	1,645,128	0	1,645,128	0	0	
14 Roseville	370	3,603,514	3,603,514	0	3,603,514	3,303,514	0	
15 Sierra	197	3,981,128	4,691,161	0	4,691,161	0	0	
16 Siskiyou	234	790,630	790,630	0	790,630	0	0	
17 Volcano	214	863,174	863,174	0	863,174	0	0	
18 Winterhaven	72	419,835	419,835	0	419,835	0	0	
Total		\$18,354,923	\$18,903,846	\$0	\$18,903,846	\$5,668,748	\$0	

\* As adjusted by Telecom. Div.