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October 3, 2019

**Via ECFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: WC Docket No. 19-90, Sunflower Enterprises, Inc.**  
**WC Docket No. 19-103, Lakeland Communications Group, LLC**  
**Notice of *Ex Parte***

Dear Ms. Dortch:

On October 2, 2019, John Kuykendall, Cassandra Heyne, and Mark Elmer of JSI (collectively, “Petitioner Representatives”) met via teleconference with Lynne Engledow, Gil Strobel, and Minsoo Kim of the Wireline Competition Bureau (“WCB”) to discuss pending petitions of Sunflower Enterprises, Inc. and Lakeland Communications Group, LLC (“Petitioners”) for waiver of Part 51 rules for modifying access rate bands and charges and 2011 Base Period Revenue.<sup>1</sup> The Petitioner Representatives urged for expeditious grant of the two waivers, as both Petitioners filed their waivers earlier in the year and are facing deadlines to complete their study area mergers. The Petitioner Representatives also discussed the need for a more streamlined process to grant similar petitions, as the Commission has previously granted similar petitions so the precedent exists to do so without delay.

Please contact the undersigned with any questions.

Sincerely,

John Kuykendall  
JSI Vice President

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<sup>1</sup> Sunflower Enterprises, Inc. Petition for Waiver of Sections 51.909(a), 51.917(b)(1) and 51.917(b)(7) of the Commission’s Rules to modify access rate bands and charges, and 2011 Base Period Revenue in connection with merger of affiliated study areas in Mississippi, WC Docket No. 19-90 (filed Mar. 27, 2019); Lakeland Communications Group, LLC Petition for Waiver of Sections 51.909(a), 51.917(b)(1) and 51.917(b)(7) of the Commission’s Rules to modify access rate bands and charges, and 2011 Base Period Revenue in connection with merger of affiliated study areas in Wisconsin, WC Docket No. 19-103 (filed Apr. 15, 2019).

cc: Lynne Engledow  
Gil Strobel  
Minsoo Kim