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October 9, 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 7, 2019, John Kuykendall and Cassandra Heyne of JSI (“Petitioner Representatives”) met with Preston Wise, Legal Advisor to Chairman Ajit Pai, to discuss the pending petitions of Lakeland Communications Group, LLC and Sunflower Enterprises, Inc. 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. Attached is summary material provided to Mr. Wise.

Please contact the undersigned with any questions.

Sincerely,

John Kuykendall  
JSI Vice President

cc: Preston Wise

Attachment

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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).

**Sunflower Enterprises, Inc. and Lakeland Communications Group, LLC**

**Petitions for Waiver of Part 51 Access Charge and Connect America Fund – Intercarrier Compensation Calculations**

***Ex Parte Meeting, October 7, 2019***

1. Sunflower Enterprises, Inc. (“Sunflower”) and Lakeland Communications Group, LLC (“Lakeland”) submitted petitions for waiver of the FCC’s Part 51 Access Charge and Connect America Fund – Intercarrier Compensation (“CAF-ICC”) calculations on March 27 and April 15, 2019, respectively. Sunflower and Lakeland seek expeditious approval of their petitions, as both entities face internal deadlines and urgency to complete transactions.
2. The FCC has precedent to not only grant the two petitions, but to do so in an efficient and streamlined way, such that all filers of similar petitions should have a reasonable expectation that they will not have to wait long for approval unless something in their petitions needs to be looked at closely. Sunflower and Lakeland have confirmed that their petitions contain nothing unusual that would require a more extensive review.
3. The following summarizes the previously-granted Part 51 petitions and emphasizes that precedent has been established and it has been determined that such waivers, which are unopposed, are in the public interest.

<b>Part 51 Waiver Petitioner</b>	<b>Date Filed</b>	<b>Date Granted</b>
Butler-Bremer Mutual Telephone Company	May 12, 2015	February 5, 2018*
Panora Communications Cooperative and Prairie Telephone Co., Inc.	July 20, 2015	February 5, 2018*
Telapex, Inc.	September 19, 2017	December 11, 2018
Venture Communications Cooperative	November 21, 2017	December 11, 2018
Titonka Telephone Company and The Burt Telephone Company	February 9, 2018	June 10, 2019
Interstate Telecommunications Cooperative	November 5, 2018	June 10, 2019
Northeast Nebraska Telephone Company	February 12, 2019	June 10, 2019
Sunflower Enterprises, Inc.	March 27, 2019	TBD
Lakeland Communications Group, LLC	April 15, 2019	TBD
TrioTel Communications, Inc.	September 18, 2019	TBD

\*Precedent established to facilitate rate-of-return study area mergers

4. Lakeland and Sunflower urge the FCC to consider granting similar waivers quarterly, as it will encourage and expedite rate-of-return study area mergers.