

October 10, 2017

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

Re: Reply Comment on Rate-of-Return Study Areas with Potentially 100 Percent Overlapped  
by Unsubsidized Competitors

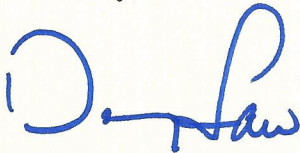
Dear Ms. Dortch,

On August 11, 2017, the Federal Communications Commission (Commission) released a Public Notice in which the Wireline Competition Bureau (Bureau) published a list of study areas potentially subject to the 100 percent overlap rule. The Commission seeks comment on whether the competitors in the study area codes (SACs) listed are offering voice and broadband to 100 percent of locations in the relevant census blocks meeting the requirements in 47 CFR § 54.319(a). The Commission has defined an unsubsidized competitor as “a facilities-based provider of residential fixed voice and broadband service that does not receive high-cost support.”

Using Form 477 data from June 30, 2016, the Commission identified 13 rate-of-return study areas listed as potentially 100% overlapped by an unsubsidized competitor or combination of unsubsidized competitors. In the list, the Bureau listed Faith Municipal Telephone Company (Faith), SAC 391653 as one such area and identified Golden West Telecommunications Cooperative, Inc. (Golden West) as a competitive provider. Golden West is an Incumbent Local Exchange Carrier. We do not compete with Faith and we do not have Competitive Local Exchange Carrier authority to operate in Faith's service area.

We provide service in areas outside the town of Faith but Golden West does not provide service within Faith's service area.

Sincerely,



Denny Law  
Chief Executive Officer  
Golden West Telecommunications Cooperative, Inc.