



1300 NORTH 17th STREET, 11th FLOOR
ARLINGTON, VIRGINIA 22209

OFFICE: (703) 812-0400
FAX: (703) 812-0486
www.fhhlaw.com
www.commlawblog.com

February 22, 2018

VIA ECFS

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Attn: Wireline Competition Bureau

**Re: Revised Notice of Consolidation of Commonly-Owned Study Areas in Iowa
Titonka Telephone Company
Iowa Study Area Codes 351310 and 351114
CC Docket No. 96-45**

Dear Ms. Dortch:

On behalf of Titonka Telephone Company (“Titonka”), transmitted herewith is a revised notification letter informing the Commission that effective July 1, 2018, Titonka (study area code 351310) will consolidate its study area with that held by its wholly-owned subsidiary, The Burk Telephone Company (study area code 351114). The study area code for Titonka will be the surviving study area code. The revised letter corrects a typographical error in the original notice filed with the FCC on February 9, 2018. In the original notice, Titonka’s study area code was inadvertently listed as 351510. The correct study area code for Titonka is 351310.

Should you have any questions with respect to this matter, please feel free to contact the undersigned.

Respectfully submitted,

/s/ Tony S. Lee

James U. Troup
Tony S. Lee

Counsel for Titonka Telephone Company and
The Burt Telephone Company

Enclosure



Titonka-Burt Communications

www.TBCtel.com

Aaron McCartan
General Manager

247 Main St. N.
P.O. Box 321
Titonka, IA 50480

Titonka@TBCtel.com
515-928-2110

February 22, 2018

VIA ECFS

Ryan Palmer, Chief
Telecommunications Access Policy Division
Wireline Competition Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

**Re: Notice of Consolidation of Commonly-Owned Study Areas¹
Titonka Telephone Company
Iowa Study Area Codes 351310 and 351114
CC Docket No. 96-45**

Dear Mr. Palmer:

By this letter, Titonka Telephone Company ("Titonka") notifies the Federal Communications Commission ("FCC") that the company will consolidate two study areas in the state of Iowa. Titonka is an incumbent rural telephone company located in Titonka, Iowa. In 1984, Titonka purchased The Burt Telephone Company ("Burt Telephone"), which became a wholly-owned subsidiary of Titonka. The two companies operated adjacent study areas in Iowa together using the same personnel and equipment. On May 23, 2003, Titonka and Burt Telephone filed a joint application with the Iowa Utilities Board ("IUB") to dissolve Burt Telephone and operate as a single corporation. The IUB approved Titonka and Burt Telephone's application on June 20, 2003,² and Burt Telephone transferred all of its customers and assets to Titonka. The combined companies operate under the name Titonka-Burt Communications. Although the companies operate under a single company name, and Burt Telephone does not have any customers, operations, or assets as they were all transferred to Titonka as part of the transaction approved by the IUB in 2003, the study areas for Titonka (study area code 351310) and Burt Telephone (study area code 351114) have remained separate.

Titonka's board of directors has decided that the company should now formally combine the two study area. A study area waiver is not required to merge the two areas because the FCC has

¹ This notice corrects a typographical error in the original notice filed with the FCC on February 9, 2018. In the original notice, Titonka's study area code was inadvertently listed as 351510. The correct study area code for Titonka is 351310.

² In Re: Titonka Tel. Co. & the Burt Tel. Co., IUB Docket Nos. SPU-03-9, 2003 WL 24091760 (June 20, 2003).



Titonka-Burt Communications

www.TBCtel.com

Aaron McCartan
General Manager

247 Main St. N.
P.O. Box 321
Titonka, IA 50480

Titonka@TBCtel.com
515-928-2110

previously ruled that no study area waiver is required when commonly-owned affiliated companies are consolidating existing study areas in the same state.³ However, contemporaneous with this notice, Titonka and Burt Telephone have filed a petition for waiver of Sections 51.917(b)(1) and 51.917(b)(7) of the Commission's rules to recalculate for the merged study areas the 2011 Interstate Switched Access Revenue Requirement and 2011 Rate-of-Return Carrier Base Period Revenue necessary to determine Connect America Fund – Intercarrier Compensation support. Grant of the requested waivers is required by the National Exchange Carrier Association to enable the company to merge Burt Telephone's study area into Titonka's study area. The study area code consolidation will be effective on July 1, 2018, with the study area code for Titonka (SAC 351310) being the surviving study area code.

Should there be any questions with respect to this matter, please feel free to contact Titonka's FCC counsel, James U. Troup or Tony S. Lee, at (703) 812-0400.

Respectfully submitted,

Aaron McCartan
General Manager
Titonka-Burt Communications

cc: Alexander Minard, FCC
Suzanne Yelen, FCC
Victor Gaither, High Cost Program, USAC
Carol Brennan, NECA

³ See Request for Clarification Filed by the National Exchange Carrier Association, Inc., and Petitions for Waivers Filed by Alaska Telephone Company, Dacor Telephone Company, and Kingsgate Telephone, Inc., Concerning the Definition of "Study Area" in the Part 36 Appendix-Glossary of the Commission's Rules, Memorandum Opinion and Order, 11 FCC Rcd. 8156, 8160 (1996).