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VIA ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, D.C. 20554

Re: Notice of Ex Parte; *Protecting Against National Security Threats to the Communications Supply Chain Through FCC Programs*, WC Docket No. 18-89

Dear Ms. Dortch:

On Tuesday, October 23, 2018, Jim Lyon, General Manager, and Jonathan Hills, Wireless Network Manager, of Mark Twain Communications Company (“Mark Twain”) and their counsel, Clare Liedquist and the undersigned with Herman & Whiteaker, LLC, met with Aaron Garza, Trent Harkrader, Daniel Kahn, Ramesh Nagarajan, Ryan Palmer and John Visclosky with the Wireline Competition Bureau of the Federal Communications Commission (“FCC” or “Commission”). During the meeting, Mr. Lyon and Mr. Hills discussed the potential negative impact of the proposed rule in the *Protecting Against National Security Threats to the Communications Supply Chain Through FCC Programs* proceeding (“*National Security NPRM*”) on small rural telecommunications companies.

Mr. Lyon described how Mark Twain is a small, rural telecommunications provider that serves northeast Missouri and receives federal universal service (“USF”) support. Mr. Lyon and Mr. Hills explained that Mark Twain switched to Huawei equipment after years of using unreliable equipment and has found it to be the most dependable and affordable option. Mr. Lyon further explained how the *National Security NPRM* has resulted in uncertainty for its equipment purchases and future deployment plans.

Mr. Lyon discussed how Mark Twain submitted bids in the Connect America Fund Phase II (“CAF II”) auction based on cost estimates for expanding its existing infrastructure, which

currently includes Huawei equipment. Mr. Lyon and Mr. Hills urged the FCC to not adopt rules that would jeopardize receipt of USF funds by Mark Twain's continued use of Huawei equipment and noted that should the FCC tie the use of certain equipment to the USF, Mark Twain would likely be forced to terminate its existing rural wireless network.

Pursuant to Section 1.1206(b) of the Commission's Rules, we are filing this letter electronically in the above-captioned docket. Please contact the undersigned if you have any questions.

Respectfully submitted,



Donald L. Herman, Jr.
Clare Liedquist
*Counsel to Mark Twain Communications
Company*

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Trent Harkrader (via email)
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