

March 12, 2018

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VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *In the Matter of W. Mansfield Jennings Limited Partnership, and Hargray Communications Group, Inc.*, WC Docket 18-52

Dear Ms. Dortch:

On March 8, 2018, Trey Judy, Director, Hargray Communications Group, Inc. (“Hargray”), Jonathan Mullen, Director of Administration, Hargray, and the undersigned met via telephone with Nicholas Degani, Senior Counsel, and Jay Schwarz, Wireline Advisor to Chairman Ajit Pai, to discuss Hargray’s pending Application to Transfer ComSouth’s Domestic Section 214 Authority to Hargray.¹

During the meeting, we reiterated that the transaction will result in tremendous public interest benefits and produce efficiencies.² We also explained that although the Federal Communications Commission’s rules provide sufficient protection to guard against any potential concerns regarding allocation of shared costs,³ Hargray has adopted internal cost allocation procedures that go above and beyond the Commission’s rules and provide additional assurances that our allocation of shared costs will be reasonable.⁴ We encouraged the Commission to approve our transaction as soon as possible.

¹ See *Application to Transfer Control of Domestic 214 Authority*, Application, WC Docket 18-52 (filed Feb. 22, 2018) (“Application”).

² See Letter from Rebekah Goodheart, counsel to Hargray, to Marlene H. Dortch, Secretary, FCC, WC Docket 18-52 (filed March 1, 2018) (“March 1 Ex Parte”).

³ See generally 47 C.F.R. pts. 32, 36, 54, 64, and 69.

⁴ See March 1 Ex Parte at 1-2.

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Please contact me if you have any questions regarding these matters.

Sincerely,

/s/ Rebekah P. Goodheart
Rebekah P. Goodheart

cc: Nicholas Degani
Jay Schwarz