



1629 K STREET, N.W. SUITE 300  
WASHINGTON, DC 20006

March 20, 2019

**SUBMITTED ELECTRONICALLY VIA ECFS**

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

Re: Rural Health Care Support Mechanism, Docket No. 02-60

Dear Ms. Dortch:

On behalf of TeleQuality Communications, LLC (TeleQuality), this *ex parte* memorializes the conference call on March 19, 2019, between counsel for TeleQuality and Liz Drogula and Johnnay Schrieber of the Wireline Competition Bureau's (WCB) Telecommunications Access Policy Division regarding WCB's recent Public Notice on rural rates in the Rural Health Care Program for Funding Year 2019.<sup>1</sup> John Nakahata of Harris, Wiltshire & Grannis LLP, and the undersigned discussed TeleQuality's concerns regarding what constitutes sufficient documentation for "publicly available" urban rates, as described in TeleQuality's petition for clarification filed on March 18, 2019.<sup>2</sup>

Pursuant to Section 1.1206(b)(2) of the Commission's rules, an electronic copy of this letter is being filed for inclusion in the above-referenced docket and courtesy copies are being sent to the attendees. Please direct any questions regarding this filing to the undersigned.

Respectfully submitted,

A handwritten signature in black ink that reads "Gina Spade". The signature is fluid and cursive.

Gina Spade  
Broadband Legal Strategies

*Counsel for TeleQuality Communications, LLC*

cc: Liz Drogula (via email)  
Johnnay Schrieber (via email)  
John Nakahata (via email)

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<sup>1</sup> *The Wireline Competition Bureau Provides Guidance Regarding the Commission's Rules for Determining Rural Rates in the Rural Health Care Telecommunications Program*, Public Notice, WC Docket No. 02-60, DA 19-92 (rel. Feb. 15, 2019).

<sup>2</sup> TeleQuality Communications LLC's Petition for Clarification at 4-8, WC Docket No. 02-60 (filed Mar. 18, 2019).