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April 18, 2019

Via ECFS

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

**Re: WC Docket Nos. 10-90, 14-58, 07-135, and CC Docket No. 01-92
Interstate Telecommunications Cooperative, Inc., and Venture
Communications
Notice of *Ex Parte***

Dear Ms. Dortch:

On Tuesday, April 16, 2019, Bryan Roth of Interstate Telecommunications Cooperative, Inc. (Interstate); Darla Rogers of Riter, Rogers, Wattier, & Northrup, LLP (representing Venture Communications); and John Kuykendall and Cassandra Heyne of JSI met with members of the Wireline Competition Bureau to discuss two issues related to Universal Service Fund (USF) and Alternative Connect America Model (A-CAM) support.

The first issue was that Interstate's Minnesota study area, an A-CAM recipient, did not certify in the HUBB by March 1, 2018 that it had no locations to report for the deployment reporting period of 2017. Interstate's two South Dakota study areas, which are Legacy USF recipients, did input newly deployed locations during the reporting period by the March 1, 2018 deadline. Because of Interstate's late certifying that its Minnesota study area had no newly deployed locations in 2017, it was penalized significantly: a reduction in A-CAM support for each day that it was late to complete the certification. This penalty amount essentially removes A-CAM support for nine locations in rural Minnesota.

Interstate and JSI noted that the FCC released a Public Notice on March 1, 2018, the day of the deadline, which stated that "a carrier **can certify** in the HUBB that it did not deploy any locations in the prior reporting year" (emphasis added). Interstate knew that it was required to report newly deployed locations, which it did for its South Dakota study areas; but the vague language of "can certify" combined with the last-minute release of the Public Notice, resulted in Interstate as well as a number of other rate-of-return A-CAM recipients not meeting the deadline to certify that they in fact had zero locations to report.

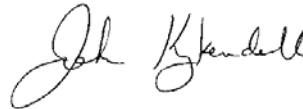
In this meeting, Interstate discussed the HUBB issue with the Wireline Bureau to determine a course of action for seeking relief from the A-CAM reduction penalty.

The second issue dealt with the pending A-CAM II offer, which both Interstate and Venture are interested in accepting. However, the companies expressed that a thorough challenge process for A-CAM II is essential to ensure that all locations lacking 25/3 Mbps can have an opportunity receive high-speed broadband deployed with A-CAM II support. Both Interstate and Venture have conducted preliminary estimates and analysis on the pending A-CAM II offer, and discovered that they are once again showing as overlapped by a nearby fixed wireless provider—the same provider that had overlapped portions of their study areas that were “knocked out” in the A-CAM I. However, in the A-CAM I challenge process, the fixed wireless provider submitted a signed declaration that it did not offer services as an unsubsidized competitor in neighboring rate-of-return study areas. The FCC granted the challenge based on that signed declaration. For reasons unknown to Interstate and Venture, the fixed wireless provider has not modified its Form 477 data in the subsequent filing periods, even though it does not provide 25/3 Mbps fixed wireless service in portions of Venture and Interstate’s study areas.

Interstate and Venture urged the Wireline Bureau to consider implementing a challenge process to make the A-CAM II offer based on factually accurate data, especially now that issues with the accuracy of Form 477 data have been raised repeatedly to FCC staff. A challenge process for A-CAM II is vital to allow affected rate-of-return carriers to demonstrate where erroneous Form 477 data is impacting support.

Please direct any questions regarding the filing to the undersigned.

Sincerely,



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