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April 19, 2018

**VIA ECFS**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
Washington, D.C. 20554

Attention: Wireline Competition Bureau

**RE: Notification of Discontinuance of Common-Carriage Tariffed Wireline  
Broadband Internet Access Service ("WBIAS") and Initiation of Provision on  
a Permissive Detariffed Common-Carriage Basis by:**

**Reservation Telephone Cooperative  
FCC Registration Number 0002477743  
Study Area Code 381632**

**CC Docket No. 02-33**

Dear Ms. Dortch:

John Staurulakis, Inc. (JSI), on behalf of Reservation Telephone Cooperative (Company), an issuing carrier for NECA Tariff F.C.C. No. 5, respectfully files the attached notice pursuant to the *Wireline Broadband Order* of the intent of the Company to discontinue its Wireline Broadband Internet Access Service (WBIAS) offerings under NECA Tariff F.C.C. No. 5 effective July 3, 2018. Upon discontinuance of the tariffed offerings, the Company will provide WBIAS on a common-carriage non-tariffed basis. See *Appropriate Framework for Broadband Access to the Internet over Wireline Facilities, Universal Service Obligations of Broadband Providers*, CC Docket No. 02-33, WC Docket No. 05-271, Report and Order and Notice of Proposed Rulemaking, 20 FCC Rcd 14853 (2005), FCC 05-150 (Rel. Sept. 23, 2005), (*Wireline Broadband Order*).

Echelon Building II, Suite 200  
9430 Research Blvd., Austin, TX 78759  
phone: 512-338-0473, fax: 512-346-0822

Eagandale Corporate Center, Suite 310  
1380 Corporate Center Curve, Eagan, MN 55121  
phone: 651-452-2660, fax: 651-452-1909

6849 Peachtree Dunwoody Road  
Bldg. B-3, Suite 200, Atlanta, GA 30328  
phone: 770-569-2105, fax: 770-410-1608

547 South Oakview Lane  
Bountiful, UT 84010  
phone: 801-294-4576, fax: 801-294-5124

Any questions regarding the notice may be directed to me at the address and telephone number listed above or by email at [jkuykendall@jsitel.com](mailto:jkuykendall@jsitel.com).

Sincerely,

A handwritten signature in black ink, appearing to read "John Kuykendall". The signature is fluid and cursive, with the first name "John" and last name "Kuykendall" clearly distinguishable.

John Kuykendall  
Vice President

Attachment

cc: Reservation Telephone Cooperative  
Special Assistant for Telecommunications at the Department of Defense  
The Office of the Honorable Doug Burgum, Governor of North Dakota  
Mark Fox, Chairman, Three Affiliated Tribes of the Fort Berthold Reservation  
North Dakota Public Service Commission  
National Exchange Carrier Association

**Notice of Permissive Detariffing of Wireline Broadband Internet Access Service  
Effective July 3, 2018 by**

**RESERVATION TELEPHONE COOPERATIVE – SAC 381632**

24 Main Street North

Parshall, ND 58770

(701) 862-3115

**CC Docket No. 02-33**

Reservation Telephone Cooperative (“Company”) hereby provides notice that it plans to terminate provision of wireline broadband Internet access service (WBIAS) on a tariffed basis effective July 3, 2018 at which time it plans to offer permissive detariffed WBIAS on a Title II common-carriage basis pursuant to paragraph 94 of the Federal Communications Commission’s *Wireline Broadband Order*.<sup>1</sup> The Company currently offers WBIAS through Asymmetric Digital Subscriber Line (“ADSL”) Access Service and Symmetric Digital Subscriber Line (“SDSL”) Access Service under National Exchange Carrier Association (“NECA”) Tariff F.C.C. No. 5, for which the Company is an issuing carrier.

The Company has requested of NECA that it remove the Company as a carrier listed in NECA Tariff F.C.C. No. 5 as a provider of ADSL and SDSL Access Services (hereinafter “WBIAS”) under the tariff effective July 3, 2018.

**Impact on Customers**

The only customer for the Company’s WBIAS is the Company’s affiliate nonregulated Internet Service Provider (“ISP”) operation. The affiliate purchases WBIAS for use as a component in its broadband Internet service sold to consumers and business customers. The discontinuance of the tariffed offering of WBIAS will have no effect on the end user service provided by the affiliate.

**Serving Area**

The company’s provision of WBIAS is limited to its ILEC serving area in North Dakota.

**Future Availability of WBIAS on a Permissive-Detariffed Common Carriage Basis**

The Company will continue to make WBIAS available on a common-carriage basis through posting of rates, terms and conditions on its Internet web-site in a manner similar to that required for interstate and international interexchange services under Section 42.10 of the FCC’s rules (47 C.F.R. § 42.10).

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<sup>1</sup> See *Appropriate Framework for Broadband Access to the Internet over Wireline Facilities, Universal Service Obligations of Broadband Providers*, CC Docket No. 02-33, WC Docket No. 05-271, Report and Order and Notice of Proposed Rulemaking, 20 FCC Rcd 14853 (2005), FCC 05-150 (Rel. Sept. 23, 2005), (*Wireline Broadband Order*).

## **RESERVATION TELEPHONE COOPERATIVE**

24 Main Street North  
Parshall, ND 58770  
(701) 862-3115

### **WBIAS DETARIFFING TIMELINE**

#### **April 19, 2018**

30-Day Notice filed with following:

Federal Communications Commission (under CC Docket No. 02-33)  
Special Assistant for Telecommunications at the Department of Defense  
The Office of the Honorable Doug Burgum Governor of North Dakota  
Mark Fox, Chairman, Three Affiliated Tribes of the Fort Berthold Reservation  
North Dakota Public Service Commission  
National Exchange Carrier Association

#### **April 19, 2018**

Notice to customers.

As indicated above, the only customer for the Company's wireline broadband Internet Access Service (WBIAS) is the Company's affiliate nonregulated ISP operation. The 30-day notice to the affiliate ISP will be provided by interoffice memorandum cover with this notice attached.

#### **June 18, 2018**

Expected filing by NECA on 15-day notice of a tariff transmittal that will include, *inter alia*, removal of Reservation Telephone Cooperative from the list of issuing carriers offering ADSL and SDSL Access Service.

#### **July 3, 2018**

Planned NECA tariff filing to become effective. Beginning on this date the Company no longer offers WBIAS under NECA Tariff F.C.C. No. 5.

#### **July 3, 2018 Forward**

WBIAS available on common-carriage non-tariffed basis under rates, terms and conditions posted at [www.rtc.coop](http://www.rtc.coop).



## CERTIFICATE OF SERVICE

I hereby certify that the foregoing Notification of Discontinuance of Common Carrier Tariffed Wireline Broadband Internet Access Service was served this 19th day of April, 2018, by mailing true and correct copies thereof, postage prepaid, to the following persons:

Secretary of Defense  
Attn: Special Assistant for Telecommunications  
1000 Defense Pentagon  
Washington, D.C. 20301-1000

The Honorable Doug Burgum  
Office of Governor  
State of North Dakota  
600 East Boulevard Avenue  
Bismarck, North Dakota 58505-0001

Mark Fox, Chairman  
Three Affiliated Tribes of the Fort Berthold Reservation  
404 Frontage Road  
New Town, ND 58763-9404

North Dakota Public Service Commission  
600 East Boulevard, Dept. 408  
Bismarck, North Dakota 58505-0480

National Exchange Carrier Association  
80 South Jefferson Road  
Whippany, New Jersey 07981

  
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