



Your business
is our business.

7852 Walker Drive, Suite 200
Greenbelt, Maryland 20770
phone: 301-459-7590, fax: 301-577-5575
internet: www.jsitel.com, e-mail: jsi@jsitel.com

April 19, 2018

Via ECFS

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

**Re: WC Docket No. 17-323 -Venture Communications Cooperative Petition for
Waiver of Commission Rules
Notice of *Ex Parte***

Dear Ms. Dortch:

On April 17, 2018, Randy Houdek of Venture Communications Cooperative (“Venture” or “the Company”), Darla Pollman Rogers of Riter Rogers, counsel for Venture and John Kuykendall and Jon Boike of JSI¹ (“Venture representatives”) met with Lynne Engledow and Douglas Slotten of the Wireline Competition Bureau (“Bureau”) to discuss Venture’s pending petition for waiver of Part 51 rules for modifying access rate bands and charges and 2011 Base Period Revenue.²

Venture representatives explained that effective January 1, 2018, the Company consolidated two South Dakota study areas - Study Area Codes 391680 and 391688 - with 391680 being the surviving study area.³ Grant of the Waiver would allow for consolidation of switched access rate bands and access rates for the merged study area as well as 2011 rate-of-return Base Period Revenues for Connect America Fund Inter-carrier Compensation (“CAF-ICC”) support. Until the Waiver is granted, Venture has the burden of maintaining the differing rate bands and revenue data. Venture requested expeditious grant of the Waiver in order that the Company may fully implement the study area consolidation.

During the meeting, the participants discussed a switch collapse that occurred in previous years in Study Area Code 391688 resulting in a host-remote configuration. As a

¹ Jon Boike joined the meeting via conference call.

² Venture Communications Cooperative Petition for Waiver of Sections 51.909(a), 51.917(b)(1) and 51.917(b)(7) of the Commission’s Rules to modify access rate bands and charges, and 2011 Base Period Revenue in connection with merger of affiliated study areas in South Dakota, WC Docket No. 17-323 (filed Nov. 21, 2017) (“Waiver”). Study Area Code 391688 was previously held by Western Telephone Company.

³ See Letter from John Kuykendall to Marlene H. Dortch, FCC Secretary, Notice of Consolidation of Commonly-Owned Study Areas, Venture Communications Cooperative South Dakota Study Areas 391680 and 391688, CC Docket No. 96-45 (filed Nov. 13, 2017).

follow up to those discussions, Venture reviewed its records and found that the switches were collapsed before 2012 so there was no issue related to double recovery. Participants also discussed the impact of the merger on CAF-ICC support which, based on current estimates, is expected to be \$13,586 this year, declining in subsequent years. This estimate is based on a combined company Interstate Originating Local Switching rate band of 1. Venture will be reviewing questions posed by the Bureau regarding these calculations with the National Exchange Carrier Association ("NECA") and provide its conclusions to the Bureau promptly.

Please direct any questions regarding the filing to the undersigned.

Sincerely,

A handwritten signature in cursive script, appearing to read "John Kuykendall".

John Kuykendall
JSI Vice President
301-459-7590

cc: Lynne Engledow
Douglas Slotten