



Taking you forward.

April 27, 2018

FILED VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-B204
Washington, D.C. 20554

**Re: Rural Call Completion Reporting
WC Docket No. 13 - 39**

Dear Ms. Dortch:

Pioneer Telephone Cooperative, Inc. (PTC) and Cellular Network Partnership (CNP) hereby file this revised rural call completion report to the Commission:

- PTC owns a majority of CNP.
- PTC and CNP are affiliated with Pioneer Long Distance, Inc. (PLD), a long-distance service provider. PLD handles all long-distance calls for PTC.
- PTC and its affiliates (including CNP and PLD), and CNP and its affiliates (including PTC and PLD) currently serve fewer than 100,000 domestic retail long-distance subscriber lines, but are filing this letter out of an abundance of caution.
- PTC and its affiliates are not “covered providers” because they do not make the initial long-distance call path choice for more than 100,000 subscriber lines.
- CNP and its affiliates are not “covered providers” because they hand off all of their long distance traffic to ANI.
- PLD hands off all its long-distance calls to ANI and USA Digital, which have been copied on this letter.

Please do not hesitate to contact me if you have any questions.

Sincerely,

Jerry Kadavy
Vice President - Network Operations

Cc: ANI Networks
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Las Vegas, NV 89119

USA Digital
300 Johnny Bench Dr, Ste 120
Oklahoma City, OK 73104

Jerry Kadavy, Vice President – Network Operations

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