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May 4, 2018

**Via Electronic Submission**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Room TW-A325  
Washington, DC 20554

Re: Notice of *Ex Parte* Presentation, WC Docket No. 17-84

Dear Ms. Dortch:

On behalf of the National Rural Electric Cooperative Association ("NRECA"), Brian O'Hara of NRECA and the undersigned met with Terri Natoli, Lisa Horne, Daniel Kahn, Michele Berlove, Celia Lewis, and Megan Capasso regarding the Commission's Further Notice of Proposed Rulemaking in the referenced matter.<sup>1</sup>

We discussed that NRECA members (electric distribution and generation and transmission cooperatives) are in rural areas in which the only wireline voice service provider is the ILEC (rate-of-return or price cap), in contrast to larger cities and metropolitan areas of the United States. Consistent with its Comments, NRECA explained that mobile service is not a substitute for wireline voice services for cooperatives and other anchor institutions in rural communities. The point was made that even today 1G mobile service is not available or may cover only a portion of service territories of cooperatives, particularly those located west of the Mississippi River. Thus, NRECA confirmed the position in its Comments filed on January 17, 2018, that forbearance is not a valid legal basis to guide the technology transition of legacy wireline voice services.

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<sup>1</sup> *In the Matter of Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment*, WC Docket No. 17-84, Report and Order, Declaratory Ruling, and Further Notice of Proposed Rulemaking, FCC 17-154 (rel. November 29, 2017).

## KELLER AND HECKMAN LLP

Marlene H. Dortch

May 4, 2018

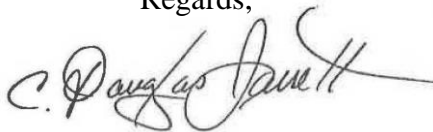
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We also noted that electric cooperatives often find themselves and the communities that they serve lacking broadband that meets the 25/3 Mbps fixed broadband benchmark. The ILECs are not deploying advanced IP networks in these rural communities, prompting an increasing number of electric cooperatives to deploy broadband networks to support their electric operations and even provide broadband service in their communities. In response to cooperative requests for high-capacity IP-based dedicated services, some ILECs decline to deploy high capacity IP facilities despite cooperatives' willingness to pay for these services, forcing cooperatives to deploy their own fiber to establish essential high capacity communications between electric substations.

In regard to the technology transition for legacy wireline voice services for business customers, NRECA restated its support for the core elements of the adequate replacement test: replacement wireline VoIP service for business customers should, at a minimum, provide 99.99% reliability, 100 ms or lower latency, provide the same geographic coverage as the legacy wireline voice services and offer full 911/E911 interoperability, opposing adoption of a presumption that any VoIP service is an adequate replacement. NRECA also noted that disclosure of the costs for the proposed IP replacement services should be provided to customers as the services providers initiate their technology transition filings with the Commission.

Please contact the undersigned with any questions.

Regards,

A handwritten signature in black ink, appearing to read "C. Douglas Jarrett", with a stylized flourish at the end.

C. Douglas Jarrett

cc: Terri Natoli  
Lisa Horne  
Daniel Kahn  
Michele Berlove  
Celia Lewis  
Megan Capasso