

May 31, 2018

Via Electronic Filing

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

Re: *Petition of USTelecom for Forbearance Pursuant to 47 U.S.C. §
160(c), WC Docket No. 18-141*

Dear Ms. Dortch:

On May 4, 2018, USTelecom filed the Petition for Forbearance referenced above and, on May 8, the FCC set the pleading cycle, so that comments would be due on June 7, with reply comments due on June 22.¹ We understand that a number of parties have requested that the Commission grant an extension of time so that interested parties have a sufficient opportunity to carefully evaluate the complex issues discussed in the petition,² and that the petitioner does not oppose such an extension.³ We, the undersigned based competitive carriers operating in the state of Maine, believe that an extension is both warranted and necessary in this instance. We file this letter in support of the requests to extend the comment deadlines until August 6 and September 7 to ensure that the Commission receives full and informed responses by affected parties and that the Commission has a complete record for its consideration.

We note that the statute allows the Commission up to 15 months to consider forbearance petitions.⁴ Typically, the Commission uses all of that time to assess the factors required by the statute to ensure that the statutory requirements are satisfied and that the public interest is served before granting such a petition. We believe that the extension requested will not interfere with the Commission's ability to meet the statutory deadline, and we encourage the Commission to extend the comment period so that it has a complete record and has weighed all the facts before it acts.

The Commission should evaluate the effect of forbearance on all impacted markets—residential, multi-location, and business of all sizes—and the impact on broadband deployment. It should also consider whether there are critical differences in rural areas, such as Maine, that

¹ Public Notice, WC Docket No. 18-141 (May 8, 2018).

² See, e.g., Motion of the National Association of Regulatory Utility Commissioner for Extension of Time, WC Docket 18-141 (May 16, 2018).

³ See Letter from USTA, WC Docket No. 18-141 (May 21, 2018).

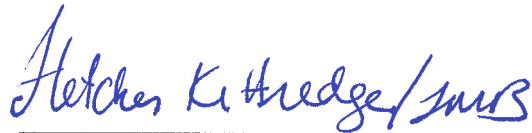
⁴ 47 U.S.C. § 160(c).

require a more nuanced approach than suggested by USTelecom. Indeed, the Commission has a long history of recognizing, through differing approaches to policy, the unique hurdles facing the more rural areas of our country. We are very concerned that adoption of USTelecom's approach will jeopardize both our own, and the Commission's, objective of expanding the availability of broadband services to all areas of the country. As competitive providers serving rural Maine, have made great strides toward that goal but require continued access to portions of the RBOC's network to enable the transition to a full facilities-based competition.

A detailed cost-benefit analysis by the Commission which addresses the impact on all parties, including those in rural areas, as well as the impact on the overall market and consumers' competitive choices, will provide the necessary support for any decision reached by the Commission. The Commission should make that cost-benefit analysis available to the parties in sufficient time for them to provide comments and any additional evidence relevant to the Commission's decision.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in blue ink that reads "Fletcher Kittredge" followed by a stylized flourish.

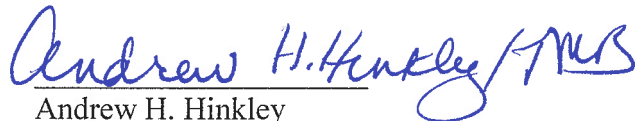
Fletcher Kittredge
CEO
Biddeford Internet Corporation

A handwritten signature in blue ink that reads "Dwight L. Allison III" followed by a stylized flourish.

Dwight L. Allison III
CEO
Maine Fiber Company, LLC

A handwritten signature in blue ink that reads "Robert Souza" followed by a stylized flourish.

Robert Souza
CEO
Otelco Inc.

A handwritten signature in blue ink that reads "Andrew H. Hinkley" followed by a stylized flourish.

Andrew H. Hinkley
Executive VP
Premium Choice Broadband and
Cornerstone Communications