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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

June 20, 2016

Via ECFS

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

**Re: WC Docket No. 10-90
Hamilton County Telephone Co-op A-CAM Challenge
Notice of *Ex Parte***

Dear Ms. Dortch:

On June 16, 2016, Kevin Pyle of Hamilton County Telephone Co-op (“Hamilton” or the “Company”) with John Kuykendall, Dave Lewis and Cassandra Heyne of JSI (collectively, “Hamilton Representatives”) met via conference call with Travis Litman of Commissioner Rosenworcel’s office. The Hamilton Representatives also met via conference call with Amy Bender of Commissioner O’Rielly’s office on June 17. The purpose of these calls was to discuss Hamilton’s April 28 challenge to the competitive coverage contained in the current version of the Alternative Connect America Cost Model (“A-CAM”).

Hamilton filed a challenge against Wisper ISP, Inc. (“Wisper”), a fixed wireless ISP, in which Hamilton made extensive arguments and provided data to show that Wisper could not possibly cover as much of Hamilton’s study area as a competitive provider as Wisper claimed on its June 2015 Form 477 data. Hamilton diligently analyzed its A-CAM results in the previous versions of the model, but only in version 6.4 did Wisper’s broadband service “knock out” over two thousand locations from A-CAM eligibility. Upon this realization, Hamilton reached out to Wisper to discuss the issue, and a series of conversations were held with Wisper where it appeared that Wisper agreed to revise its Form 477 and only report the census blocks where it had active broadband customers (see Attachment 1 – map of Hamilton’s study area with Wisper’s Form 477 data vs. Wisper’s actual active customers)¹. However, Wisper ultimately reversed course and ceased communicating with Hamilton and did not revise its Form 477, which promoted Hamilton to file its April 28 challenge.

On the above-mentioned calls with FCC Commissioner staff members, the Hamilton Representatives discussed how Hamilton is an excellent candidate for the A-CAM and was planning to elect model support. Hamilton respectfully requested that its challenge be granted and that the FCC look into Wisper’s Form 477 data. Hamilton

¹ The attached map, Attachment 1, is included in Hamilton’s April 28 A-CAM challenge, WC Docket No. 10-90. This map was discussed on the two calls with Commissioner staff.

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

informed Commissioner staff that other ILECs had also filed challenges against Wisper for similar circumstances.

Please direct any questions regarding the filing to the undersigned.

Sincerely,

A handwritten signature in black ink that reads "John Kuykendall". The signature is written in a cursive style with a large initial "J" and "K".

John Kuykendall

JSI Vice President

301-459-7590 jkuykendall@jsitel.com

Attachment 1

RED Census Blocks - Blocks reported by Wisper as having 10/1 capable broadband, which would "knock out" Hamilton from A-CAM eligibility

GREY Census Blocks - Blocks where Wisper has actual subscribers

