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VIA ECFS

June 27, 2018

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: WC Docket No. 18-129
Notice of *Ex Parte*

Dear Ms. Dortch:

On June 25-26, 2018, Ryan Boone of Mutual Telephone Company of Sioux Center, Iowa d/b/a Premier Communications (“Mutual”) and John Kuykendall of JSI (collectively the “Mutual Representatives”) met separately via conference call with Jay Schwarz of Chairman Pai’s office and Amy Bender of Commissioner O’Rielly’s office. The meetings were held to discuss the Joint Application for Domestic Section 214 Transfer of Control filed April 30, 2018 by Mutual and Hospers Telephone Exchange, Inc. d/b/a HTC Communications (“Hospers”).¹ The comment cycle on the Joint Application ended on June 22. Comments supporting the transaction were jointly submitted by NTCA-The Rural Broadband Association and the Iowa Communications Alliance. No comments were filed in opposition to the transaction.

The discussions focused on the implementation of the condition that applies to “mixed support” transactions described in the *Hargray-ComSouth Order* when an average schedule company is involved in the transaction.² The Mutual Representatives asked whether the transaction could be handled by the Bureau under delegated authority or if Commission involvement was necessary. In the meetings with Dr. Schwarz and Ms. Bender, both stated

¹ See *Domestic Section 214 Application for the Transfer of Control of Hoppers Telephone Exchange, Inc. d/b/a HTC Communications to Mutual Telephone Company of Sioux Center, Iowa d/b/a Premier Communications*, WC Docket No. 18-129 (filed April 30, 2018) (“Joint Application”); supplemented May 15, 2018.

² See *In the Matter of Joint Application of W. Mansfield Jennings Limited Partnership and Hargray Communications Group, Inc. for Consent to the Transfer of Control of ComSouth Corporation Pursuant to Section 214 of the Communications Act of 1934*, WC Docket No. 18-52, Memorandum Opinion and Order, FCC 18-62 (May 11, 2018) (the “*Hargray-ComSouth Order*”) at para. 27 & n.72.

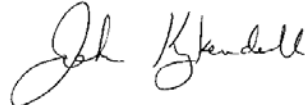
Marlene H. Dortch, Secretary

Page Two

that the *Hargray-ComSouth Order* addressed “mixed support” transactions involving average schedule companies so that the Bureau could act on future transactions without action at the Commission level. The Mutual Representatives then urged Dr. Schwarz and Ms. Bender to ensure that the Bureau has whatever guidance they may need as it is critical that the Bureau move forward expeditiously with granting the Joint Application.

Please contact the undersigned with any questions.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "John Kuykendall". The signature is fluid and cursive, with the first name "John" and last name "Kuykendall" clearly distinguishable.

John Kuykendall
Vice President

cc: Jay Schwarz
Amy Bender