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July 5, 2016

**Via ECFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> 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 30, 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 Nick Degani of Commissioner Pai’s office. The purpose of this call 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 fixed wireless 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 in a small section of Hamilton’s study area (see Attachment 1 – map of Hamilton’s study area with Wisper’s Form 477 data vs. Wisper’s actual active customers)<sup>1</sup>. However, Wisper ultimately did not revise its Form 477, which prompted Hamilton to file its April 28 challenge.

On the above-mentioned call with Mr. Degani, 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 informed Mr. Degani that other ILECs had also filed challenges against Wisper for similar circumstances.

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<sup>1</sup> 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 call with Commissioner staff.

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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](mailto:jkuykendall@jsitel.com)

Cc: Nick Degani

