



July 7, 2017

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

Re: Connect America Fund, WC Docket No. 10-90

Dear Ms. Dortch:

Premier Communications is a rate of return carrier in the states of Iowa, Minnesota, and South Dakota. In 2016, Premier purchased Consolidated's exchanges (WC docket No. 10-90, DA 16-1066). The exchanges are subject to Consolidated's CAF II deployment obligations as established by the 2014 Connect America Fund "REPORT AND ORDER" (FCC 14-190).

Premier has conducted an audit of locations to determine the number of allowed locations in their Heartland exchanges. Within those exchanges Premier has deployment obligations of 2,767 locations. The number of allowed locations within the Heartland exchanges is 2,617 locations, creating a "location gap" of 50 locations.

According to paragraph 33 of the 2014 Connect America Fund "REPORT AND ORDER" (FCC 14-190), price cap carriers are able to substitute extremely high-cost locations in adjacent census blocks for locations in eligible census blocks, provided the total number of locations served is equal to or greater than the number of supported locations in the eligible census blocks. In Attachment A, Premier has identified census blocks they will be using to meet their ROFR build out obligations.

Questions, please contact Ryan Boone at (712)-722-3451 / rboone@wmypremieronline.com or Jesse Taylor at (605)- 995-1819 / Jesse.Taylor@vantagepnt.com

Sincerely,

Jesse Taylor

Attachment A

Census Block	State	Carrier	Study Area Code
191199502003051	IA	Premier	351096
191670701004007	IA	Premier	351096
191670703001051	IA	Premier	351096
191499706001057	IA	Premier	351096
191434601004206	IA	Premier	351096
191199503005044	IA	Premier	351096
191199503006128	IA	Premier	351096
191670703002014	IA	Premier	351096
191434601004150	IA	Premier	351096
191199502003064	IA	Premier	351096
191199501003086	IA	Premier	351096
191670703002017	IA	Premier	351096
191670703001050	IA	Premier	351096
191670704001205	IA	Premier	351096
191670703002045	IA	Premier	351096
191670702002015	IA	Premier	351096
191670703001167	IA	Premier	351096
191199502003039	IA	Premier	351096
191670704001294	IA	Premier	351096
191434601004168	IA	Premier	351096
191670704001275	IA	Premier	351096
191670703002087	IA	Premier	351096
191199503001072	IA	Premier	351096
191670704001083	IA	Premier	351096
191670704001177	IA	Premier	351096
191199502003083	IA	Premier	351096
191670704001059	IA	Premier	351096
191670704001152	IA	Premier	351096
191670704001163	IA	Premier	351096
191499706001066	IA	Premier	351096

191199503001000	IA	Premier	351096
191199502003079	IA	Premier	351096
191199503006130	IA	Premier	351096
191670704001193	IA	Premier	351096
191434601004190	IA	Premier	351096
191434601004190	IA	Premier	351096
191670704001280	IA	Premier	351096
191670704001297	IA	Premier	351096
191499703004062	IA	Premier	351096
191499703002063	IA	Premier	351096
191199502003074	IA	Premier	351096
191670704001273	IA	Premier	351096
191199502003037	IA	Premier	351096
191670704001293	IA	Premier	351096
191434601004014	IA	Premier	351096
191199503006118	IA	Premier	351096
191670704001299	IA	Premier	351096
191199502003052	IA	Premier	351096
191670704001178	IA	Premier	351096
191199501001026	IA	Premier	351096
191670704001277	IA	Premier	351096
191434601004029	IA	Premier	351096
191670704001126	IA	Premier	351096
191434601004109	IA	Premier	351096
191670704001125	IA	Premier	351096
191670704001301	IA	Premier	351096
191670703001155	IA	Premier	351096
191670704001167	IA	Premier	351096
191199503006048	IA	Premier	351096
191499703002079	IA	Premier	351096
191670703001026	IA	Premier	351096
191499703002077	IA	Premier	351096
191499703004126	IA	Premier	351096
191199503001003	IA	Premier	351096
191670704001298	IA	Premier	351096



191199502003066	IA	Premier	351096
191670704001170	IA	Premier	351096
191199503006000	IA	Premier	351096
191670704001240	IA	Premier	351096
191670704001253	IA	Premier	351096
191434601004032	IA	Premier	351096
191670704001162	IA	Premier	351096
191670703001027	IA	Premier	351096