

## ILLINOIS TELEPHONE COOPERATIVE ASSOCIATION RURAL CO-OPS

July 30, 2018

### ***Ex Parte Letter***

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

**RE:   *Connect America Fund, WC Docket No. 10-90; ETC Annual Reports and  
Certifications, WC Docket No. 14-58; Establishing Just and Reasonable Rates  
for Local Exchange Carriers, WC Docket No. 07-135; Developing a Unified  
Intercarrier Compensation Regime, CC Docket No. 01-92.  
Hamilton County Telephone Co-op Petition for Reconsideration***

Dear Ms. Dortch

Adams Telephone Co-Operative, Egyptian Telephone Cooperative Association, Flat Rock Telephone Co-Op, Inc., Gridley Telephone Company<sup>1</sup>, McDonough Telephone Cooperative, Mid-Century Telephone Co-op, Oneida Telephone Exchange, and Wabash Telephone Cooperative, Inc. (collectively, “IL ITCA Rural Co-ops” or “IL Rural Co-ops”), submit this *ex parte* letter to encourage the Federal Communications Commission (“FCC”) to grant the Petition for Reconsideration (“Petition”) filed by Hamilton County Telephone Co-op (“Hamilton”) on May 8, 2018 in the above-referenced proceedings.<sup>2</sup>

In its Petition, Hamilton seeks the opportunity to obtain additional Alternative Connect America Cost Model (“A-CAM”) support in light of the fact that an unsubsidized fixed wireless provider, Wisper, had significantly overstated its 10/1 Mbps broadband coverage on the FCC Form 477 at the time that the A-CAM offers were made to rate of return companies. As a direct result of the overstated broadband coverage, Hamilton was not eligible to receive A-CAM support for a large and very rural portion of its study area, which remains unserved to this day. Since the A-CAM offer, Hamilton has subsequently filed a challenge, multiple *ex parte* notices, and spoken directly with Commission staff in addition to its Petition, to make the FCC aware of the issue. Also, Wisper has revised its Form 477 broadband coverage and reduced the number of census blocks that it claims to serve in Hamilton’s study area.

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<sup>1</sup> Although Gridley Telephone Company is not a cooperative, the company is included in the group as it is owned by a cooperative and is supportive of the petition.

<sup>2</sup> Petition for Reconsideration, Hamilton County Telephone Co-op, WC Docket No. 10-90 *et al.*, filed May 8, 2018.

The IL Rural Co-ops urge the FCC to grant Hamilton's Petition because there are currently thousands of "abandoned locations" in Hamilton's rate-of-return study area that have no alternative for broadband service because Wisper falsely claimed that it could serve these locations. Broadband is critical for the rural residents and businesses in Illinois for economic development, education, healthcare, and overall wellbeing.

While several, but not all, of the IL Rural Co-ops are in Wisper's "so-called" serving area, all are well familiar with Wisper's over-reporting of broadband. For those of us in those so-called areas, we too, would have been ineligible for A-CAM support in portions of our study areas because of Wisper claiming to serve areas that it did not serve. The IL Rural Co-ops have invested millions of dollars of our own capital, of federal Universal Service Fund support, and of Rural Utilities Service loans and grants to ensure that even the most rural locations have access to state-of-the-art service. However, many locations remain unserved and the A-CAM was an efficient and effective means to fund broadband projects in unserved areas for some Illinois companies. Wisper's reckless over-reporting of broadband impacted a model that determined ten years of broadband funding for numerous rate-of-return companies, and Hamilton in particular was impacted the hardest.

The IL Rural Co-ops note that Hamilton's Petition received no opposition, and in fact received a letter of support from NTCA.<sup>3</sup> The IL Rural Co-ops urge the FCC to grant Hamilton's Petition and immediately provide the requested funding to the thousands of "abandoned locations" as part of the funding being allocated now as part of the recent revised offer made to Hamilton and other A-CAM carriers.

Respectfully Submitted,

**IL ITCA Rural Co-ops**

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By: /s/ Kevin J. Jacobsen

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<sup>3</sup> See *Ex Parte* Letter from Michael R. Romano, Senior Vice President – Industry Affairs & Business Development, NTCA – The Rural Broadband Association, to Marlene H. Dortch, WC Docket No. 10-90 *et al.*, July 13, 2018.

Continued...

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