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July 31, 2017

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

**Re: Notice of *Ex Parte* Presentation in CC Docket No. 80-286  
Petition of Terral Telephone Company, Inc. For Waiver of 47 C.F.R. Sections 36.3,  
36.123-126, 36.141, 36.152-157, 36.191 and 36.372-382 to Unfreeze Part 36  
Category Relationships**

Dear Ms. Dortch:

On July 27, 2017, Terral Telephone Company, Inc. (Terral) met with Dr. Jay Schwarz, Wireline Advisor to Chairman Pai, and Kris Monteith, Lisa Hone, Pam Arluk, John Hunter, Rhonda Lien, Edward Krachmer, and William Kehoe of the Wireline Competition Bureau in connection with Terral's pending waiver request in the above-referenced docket. Separately, Terral also met with Amy Bender, Legal Advisor to Commissioner O'Rielly and Claude Aiken, Legal Advisor to Commissioner Clyburn. Dick Segress and Chad Segress of Terral, Charles Curtis of Aegis Consulting Group and the undersigned attended the meetings for Terral.

In the meetings, we discussed the waiver petition Terral filed on August 29, 2012 and summarized the issues raised by the Petition. We explained that Terral had agreed in 2001 to freeze its separations category relationships in reliance on the Commission's statement that it would be for five years or less. Since that time, Terral has made substantial investments and deployed fiber facilities which places a disproportionate share of Terral's investment on the intrastate jurisdiction based on the frozen categories. We explained that grant of the petition would reduce Terral's federal and state universal service support. We explained that Terral's fiber facilities are the only backhaul facilities available for wireless towers and broadband services in other local service territories where the incumbent local exchange carrier does not provide broadband service, including services to schools, medical facilities and municipalities. We noted that the FCC has granted similar petitions.

Terral renewed its request that the Commission act promptly to grant its long-pending waiver request in order that proper jurisdictional allocations of investment and expense may be recognized.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed via ECFS. If you have any questions, please do not hesitate to contact the undersigned.

Sincerely,

/s/ Mary J. Sisak

cc: Dr. Jay Schwarz  
Amy Bender  
Claude Aiken  
Kris Monteith  
Lisa Hone  
Pam Arluk  
John Hunter  
Rhonda Lien  
Edward Krachmer  
William Kehoe