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August 6, 2018

Via ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

**Re: WC Docket Nos. 10-90, 14-58, 07-135; CC Docket No. 01-92
Grand River Mutual Telephone Corporation
Notice of *Ex Parte***

Dear Ms. Dortch:

On August 3, 2018, Ron Hinds of Grand River Mutual Telephone Corporation (“GRM” or the “Cooperative”) and John Kuykendall of JSI (collectively, “GRM Representatives”) met via teleconference with Jay Schwarz, wireline advisor to Federal Communications Commission (“FCC”) Chairman Ajit Pai. The matters discussed in the teleconference pertained to a Petition for Reconsideration¹ of the FCC’s *R&O and NPRM*² which provided for additional \$36.5 million in Alternative Connect America Cost Model (“A-CAM”) funding and a subsequent ex parte letter relating to the Petition.³

The Petition seeks A-CAM funding for 747 rural locations in the Cooperative’s Missouri study area that were precluded from receiving any support due to an inadvertent clerical error in GRM’s June 2015 FCC Form 477 data. During the meeting, the participants discussed the fact that not all eligible carriers elected additional A-CAM support when revised offers were made in the July 20, 2018 Public Notice⁴ and urged the FCC to use the remaining balance plus additional funds, if necessary, for the “orphaned” locations. In the event that the FCC did not use those funds, the GRM Representatives

¹ Petition for Reconsideration, Grand River Mutual Telephone Corporation, WC Docket No. 10-90 et al., filed May 2, 2018 (“Petition”).

² Report and Order, Third Order on Reconsideration and Notice of Proposed Rulemaking, WC Docket Nos. 10-90, 14-58, 07-135, CC Docket No. 01-92 (rel. March 23, 2018), FCC 18-29 (“*R&O and NPRM*”).

³ See Letter from Ronald T. Hinds, Chief Executive Officer of Grand River Mutual Telephone Corporation to Marlene H. Dortch, Secretary, FCC (filed July 26, 2018).

⁴ *Wireline Competition Bureau Authorizes 175 Rate-of-Return Companies to Receive an Additional \$36 Million Annually in Alternative Connect America Model Support to Expand Rural Broadband*, WC Docket No. 10-90, DA 18-750, rel. July 20, 2018 (“Public Notice”).

urged that the additional funding be made available to these locations as the FCC considers increasing the budget for rate-of-return carriers.⁵

Please contact the undersigned with any questions.

Sincerely,

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

John Kuykendall
JSI Vice President

cc: Jay Schwarz

⁵ See *R&O and NPRM* at para. 107 (FCC seeking comment on revising the budget for rate-of-return carriers within the high-cost universal service fund program).