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VIA ELECTRONIC FILING

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

Re: Ex Parte Letter, Connect America Fund; Petition for Clarification or Declaratory Ruling of Northeast Iowa Telephone Company and Western Iowa Telephone Association, WC Docket No. 10-90, DA 19-579

Dear Ms. Dortch:

On Monday, August 5, 2019, David Byers, Chief Operating Officer of Northeast Iowa Telephone Company (“NEIT”), Heath Mallory, Chief Executive Officer of Western Iowa Telephone Association (“WIATEL”) (collectively, the “Carriers”), and their counsel, Molly O’Conor¹ and the undersigned with Herman & Whiteaker, LLC, met with Arielle Roth, Wireline Legal Advisor to Commissioner Michael O’Rielly of the Federal Communications Commission (“FCC” or “Commission”). During the meeting, Mr. Byers and Mr. Mallory discussed the Carriers’ Petition for Declaratory Ruling on the definition of locations under the Alternative Connect America Cost Model (“A-CAM”) for home-based businesses² and the Wireline Competition Bureau’s guidance regarding A-CAM final deployment obligations in the above

¹ David Byers, Heath Mallory and Molly O’Conor joined via telephone.

² Joint Petition of Northeast Iowa Telephone Co. and Western Iowa Telephone Association, Petition for Clarification or Declaratory Ruling on the Definition of Location for Home Offices Under the Connect America Fund-Alternative Connect America Cost Model, WC Docket 10-90 (May 6, 2019) (Petition); *Comments Sought on Petition for Declaratory Ruling of Northeast Iowa Telephone Company and Western Iowa Telephone Association*, WC Docket No. 10-90, Public Notice, DA 19-579 (rel. June 20, 2019).

captioned proceeding.³ In the meeting, the Carriers reiterated the need to treat home-based businesses as eligible locations under A-CAM so long as a carrier provides service to such business within ten (10) business days, pursuant to FCC rules. The Carriers reiterated that time is of the essence for the FCC to instruct USAC to correct its Frequently Asked Questions regarding the treatment of home-based businesses because existing A-CAM recipients are making investments and actively working toward their goal of providing service to all eligible locations within their own service territories.

Pursuant to Section 1.1206(b) of the Commission's Rules, we are filing this letter electronically in the above-captioned docket. Please contact the undersigned if you have any questions.

Respectfully submitted,



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cc: Arielle Roth (via email)

³ *Wireline Competition Bureau Provides Guidance Regarding Alternative Connect America Model Final Deployment Obligations*, WC Docket No. 10-90, Public Notice, DA 19-650 (rel. July 12, 2019).