



1629 K STREET, N.W. SUITE 300
WASHINGTON, DC 20006

August 12, 2019

SUBMITTED ELECTRONICALLY VIA ECFS

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

Re: Notice of Ex Parte in the Matter of Petition for Rulemaking to Amend and Modernize
Part 54 of the Commission's Rules, RM-11841
CC Docket No. 02-6 and WC Docket No. 13-184

Dear Ms. Dortch:

On August 8, 2019, representatives of the Texas Education Service Centers (ESC) Regions 10, 11 and 15 met with Nirali Patel, wireline advisor for Chairman Pai¹ regarding the Petition for Rulemaking filed by Central Texas Telephone Cooperative, Inc., Peoples Telephone Cooperative, Inc, and Totelcom Communications, LLC.² During our meeting, we discussed various issues raised in the comments and replies filed by Regions 10 and 11.

Attendees were Dr. Gordon Taylor, Executive Director, Region 10 ESC; Brent Goerner, Director/Chief Technology Officer, Region 10 ESC; Dr. Clyde Steelman, Executive Director, ESC Region 11; Rory Peacock, Deputy Executive Director, Technology, ESC Region 11; Randon Lance, Director of Network Services, ESC Region 15 (collectively, the ESCs); Russell Neal, VST Services, E-rate consultant for Regions 10 and 11; and myself.

Respectfully submitted,

A handwritten signature in black ink that reads "Gina Spade". The signature is fluid and cursive, with the first name "Gina" and last name "Spade" clearly distinguishable.

Gina Spade
Counsel to Texas ESC Region 10

cc: Nirali Patel, Office of the Chairman

¹ 47 C.F.R. § 1.1206.

² Petition for Rulemaking of Central Texas Telephone Cooperative, Inc., Peoples Telephone Cooperative, Inc. and Totelcom Communications, LLC, RM-11841, CC Docket No. 02-6, WC Docket No. 13-184 (filed May 22, 2019).