



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

August 13, 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 D'wana Terry, deputy chief of the Wireline Competition Bureau (WCB); Gabriela Gross, deputy division chief of the Telecommunications Access Policy Division (TAPD), WCB; and Stephanie Minnock, attorney-advisor in TAPD, WCB.¹ The subject of the meeting was 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.

We discussed how the consortium approach has helped Texas school districts obtain better service for lower prices, especially when compared to some of the existing carriers. We discussed how the Texas Carriers' Petition mischaracterized the competitive bidding processes conducted by the ESCs.

We also discussed how the Texas Carriers' proposed approach would harm, rather than foster,

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).

competition in the E-rate program, by giving incumbents a second bite at the apple and potentially disincentivizing competitors from bidding. Finally, we explained that the high-cost and E-rate programs have different goals, and thus that the Texas Carriers' characterization of new fiber installation as duplicative and wasteful is incorrect.

Respectfully submitted,

A handwritten signature in cursive script, reading "Gina Spade".

Gina Spade
Counsel to Texas ESC Region 10

cc: D'wana Terry, WCB
Gabriela Gross, TAPD/WCB
Stephanie Minnock, TAPD/WCB