

# HERMAN & WHITEAKER, LLC

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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 Notice, 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 Tuesday, August 13, 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, Clare L. Andonov and the undersigned with Herman & Whiteaker, LLC, met with Ted Burmeister,<sup>1</sup> Jesse Jachman, Nissa Laughner, Sue McNeil and Suzanne Yelen of the Wireline Competition Bureau of the Federal Communications Commission (“FCC” or “Commission”). During the meeting, Mr. Byers and Mr. Mallory discussed the Carriers’ Petition for Declaratory Ruling<sup>2</sup> on the definition of locations under the Alternative Connect America Cost Model (“A-CAM”) for home-based businesses and the comments filed in unanimous support of the Petition. The

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<sup>1</sup> Via telephone.

<sup>2</sup> 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).

Carriers reiterated the need to treat home-based businesses as eligible locations under A-CAM so long as the businesses are registered with the state or other government entity and the A-CAM carrier can provide service to such businesses within ten (10) business days, pursuant to FCC rules. Mr. Byers and Mr. Mallory voiced concerns that imposing additional requirements for home-based businesses to count as locations would penalize A-CAM recipients that have made substantial investments to buildout their study area in reliance of the funding amount and number of locations articulated in the A-CAM offer they accepted.

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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