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August 19, 2016

VIA ECFS

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

Re: WC Docket No. 08-71: Application for Review of SureWest Communications

Dear Ms. Dortch:

Pursuant to 47 CFR § 1.1206(b)(2), this letter provides notice that, on August 18, 2016, the undersigned met with Claude Aiken, legal advisor to Commissioner Clyburn, concerning the above-referenced matter. Michael Shultz, Vice President; Scott Kitchen, Director – Regulatory Compliance; and Kevin Kastor, Manager – Regulatory & Legislative Affairs, all of Consolidated Communications, Inc. ("Consolidated"), participated in the meeting by telephone.

During the meeting, Consolidated summarized the arguments presented in the Application for Review filed in this docket by its subsidiary, Consolidated Communications of California Company (formerly known as SureWest Telephone). In particular, Consolidated explained that the Wireline Competition Bureau's analysis in its order denying SureWest's petition for waiver (DA 13-2093) did not take account of all the circumstances leading up to the omission of its name from the California PUC's certification of eligible telecommunications carriers, due Oct. 1, 2012. Although the Bureau characterized this certification as a "critical part of the Commission's uniform national framework for accountability," it overlooked the fact that SureWest *had* filed a certification of compliance with the Commission covering its ICLS support (the only form of support it received at the time of the filing) which remained in effect during the two calendar quarters covered by SureWest's waiver request. Consolidated also pointed out that although the omission of the California PUC certification was the result of an oversight by SureWest, this omission should be excusable in light of (a) the lack of any consequences to other high-cost fund recipients, unlike situations in which a carrier has failed to file line counts or other data required by USAC to make calculations; (b) the confusion caused by the coincidence of SureWest's conversion from rate-of-return to price cap status in October 2012 as a result of its acquisition by Consolidated, and the changes in the high-cost certification requirements resulting from the 2011 Transformation Order.

Further, Consolidated suggested that granting the Application for Review and the requested waiver would benefit the public interest, by permitting Consolidated to accelerate broadband deployment projects in California that had to be deferred due to the loss of two quarters' worth of support. Allowing Consolidated to receive this withheld funding would enable it to improve service to underserved consumers who currently receive less than 10/1 mbps broadband service. Consolidated committed that, if the Commission allows it to receive this funding, it will use 100% of the funds to deploy broadband-capable facilities to such underserved customers.

Sincerely,

s/Russell M. Blau

Russell M. Blau
Attorney for Consolidated Communications of
California Company, f/k/a SureWest Telephone

c: Claude Aiken