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VIA ECFS

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

RE: Notice of Ex Parte: *Improving Competitive Broadband Access to Multiple Tenant Environments*, Notice of Inquiry, GN Docket No. 17-142

Dear Ms. Dortch:

On Tuesday, September 12, 2017, Donald L. Herman, Jr. and Clare Liedquist, counsel for Horry Telephone Cooperative (“HTC”), met with Nathan Eagan, Acting Wireline Legal Advisor to Commissioner Brendan Carr, of the Federal Communications Commission. During the meeting, we discussed HTC’s comments filed in the above captioned Notice of Inquiry. We discussed, more specifically, that in HTC’s market, bulk billing arrangements are being used by national competitors as a means to stifle competition by offering below market pricing on cable, broadband and voice services to single, detached dwellings with a common home owners’ association. HTC urged the Commission to release a Notice of Proposed Rulemaking seeking comment on specific proposals to curb the use of bulk billing arrangements as a means to engage in anti-competitive behavior.

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,



Donald L. Herman, Jr.
Counsel for HTC

cc (via email): Nathan Eagan