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September 28, 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 September 27, 2016, the undersigned met with Commissioner Ajit Pai and his legal advisor, Nick Degani, concerning the above-referenced matter, on behalf of our client, Consolidated Communications (“Consolidated”).

During the meeting, we 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).

We stated 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. By contrast, there is no public interest benefit to delaying broadband deployment to underserved customers in Consolidated’s California service territory. The Wireline Competition Bureau relied on just such a public interest analysis in granting a similar waiver of a filing deadline in *Smith Bagley, Inc. Petition for Waiver Section 54.809(c) of the Commission’s Rules and Regulations*, Order, CC Docket No. 96-45, 16 FCC Rcd. 15275 (Wireline Comp. Bur. 2001).

We also noted that approval of the waiver would not adversely affect the Commission’s high-cost support policy objectives. Because SureWest had filed a certification of compliance with the FCC covering the *same two calendar quarters* for which support was withheld, due to the transition rules adopted in the 2011 *Transformation Order*, there is no potential gap in the Commission’s

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oversight of the use of high-cost support funds. For the same reason, it is extremely unlikely that granting this waiver would create a precedent that could result in additional waiver requests by other companies.

Accordingly, we urged the Commission to grant SureWest's application for review.

Sincerely,

s/Andrew D. Lipman

s/Russell M. Blau

Andrew D. Lipman

Russell M. Blau

Attorneys for Consolidated Communications of
California Company, f/k/a SureWest Telephone

c: Commissioner Ajit Pai
Nick Degani