

November 17, 2017

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

Attention: Wireline Competition Bureau

Re: **Petition for Waiver of Accounting Rules**  
**The Champaign Telephone Company**  
**WC Docket No.**

Dear Ms. Dortch:

On behalf of The Champaign Telephone Company (CTC), Consortia Consulting, respectfully submits the above-referenced Petition for Waiver of Accounting Rules. CTC seeks a waiver “of the requirement adopted in the 1980s’ Cost Separation proceeding that ‘investments once allocated to nonregulated use may not be reallocated to regulated use,’ consistent with the waiver process contemplated at that time.” By granting this waiver, CTC would be allowed to allocate its loop investment to regulated costs, which will bring CTC into compliance with the Commission’s cost separations requirements, will be consistent with the Commission’s *Rate-of-Return Order*, and will further the Commission’s objective of supporting broadband-capable networks in areas served by rate-of-return carriers.

Please direct inquiries regarding the CTCs Petition for Waiver to the undersigned consultant for the Company.

Sincerely,



Dan Davis  
Director Policy Analysis