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VIA ECFS

November 25, 2019

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554
Attention: Wireline Competition Bureau

**Re: WC Docket No. 19-332
Supplement to Inter-Community Telephone Company, L.L.C. Petition for
Waiver of Sections 51.909(a), 51.917(b)(1) and 51.917(b)(7) of the
Commission's Rules**

Dear Ms. Dortch:

At the request of Commission staff, JSI hereby supplements the record on behalf of Inter-Community Telephone Company, L.L.C. ("ICTC") in the above-referenced pending petition for waiver filed in connection with a consolidation of the ICTC and Absaraka Cooperative Telephone Company, Inc. ("Absaraka") study areas.¹

Mixed Support Conditions No Longer Apply

ICTC is a wholly-owned subsidiary of BEK Communications Cooperative ("BEK"). The following information is provided to demonstrate that the conditions set forth in the October 1, 2018 Public Notice granting the domestic 214 transfer of control of ICTC to BEK would no longer apply.²

January 24, 2017	ICTC and Absaraka were authorized to receive Alternative Connect America Cost Model ("A-CAM") support.
October 1, 2018	The Commission granted the domestic 214 transfer of control of ICTC to BEK subject to compliance with conditions for mixed support based on ICTC's receipt of model-based support and BEK's receipt of cost-based support.

¹ Inter-Community Telephone Company, L.L.C. Petition for Waiver of Sections 51.909(a), 51.917(b)(1) and 51.917(b)(7) of the Commission's Rules to modify access rate bands and charges, and 2011 Base Period Revenue in connection with merger of affiliated study areas in North Dakota, WC Docket No. 19-332 (filed Nov. 1, 2019) ("Petition").

² Domestic 214 Application Granted Subject to Condition, DA 18-1006, WC Docket 18-223 (rel. Oct. 1, 2018) ("October 1, 2018 Public Notice").

August 22, 2019 BEK was authorized to receive A-CAM II support. Consequently, BEK, ICTC and Absaraka all currently receive model-based support, and the mixed support conditions no longer apply.³

As stated in the Petition, ICTC elected BDS regulation effective July 2, 2019, and Absaraka intends to elect BDS regulation in 2020. BEK will also elect BDS in 2020, resulting in consistent regulatory treatment of all companies effective July 1, 2020.

Consolidated Rate Band Assignment

The assignment of Local Switching Rate Band 8 as shown in Exhibit A to the Petition was confirmed by the National Exchange Carrier Association (“NECA”) as the appropriate assignment consistent with the methodology historically used for other rate band consolidations. Specifically, each company’s local switching costs and minutes from the 2011 base period are used to determine a combined local switching cost per minute. The 2011 rate band ranges are then used to assign a combined local switching cost per minute to a band.

Inquiries may be directed to the undersigned.

Sincerely,



John Kuykendall
Vice President
jkuykendall@jsitel.com

on behalf of

Inter-Community Telephone Company, L.L.C.

cc: Lynne Engledow
 Doug Slotten
 Chris Koves

³ See *Id.*, “The condition will also sunset if all of a post-consummation company’s rate-of-return subsidiaries become model-based support companies at any point during the seven-year period.”