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November 30, 2016

Via Electronic Filing

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-A325
Washington, DC 20554

Re: In the Matter of Lifeline and Link Up Reform and Modernization
Notice of Forbearance from Lifeline BIAS Requirements
WC Docket No. 11-42

Pursuant to the *Lifeline Modernization Order*[1] and the *BIAS Forbearance Public Notice*,[2] Union Telephone Company d/b/a Union Wireless, d/b/a Union Cellular ("Union Wireless" or "Company") submits this Notice of Forbearance from Lifeline broadband internet access service ("BIAS") requirements.

Union Wireless is a competitive ETC with service areas in portions of Wyoming. As a recipient of frozen high cost support ("FHCS"), the Company is not required to provide Lifeline-supported BIAS in its ETC service areas.[3] Union Wireless hereby provides notice that it is availing itself of the FCC's forbearance from the Lifeline BIAS requirement throughout its ETC service area. Information regarding the Company's ETC designation is provided in Attachment A.

In Attachment B, submitted separately via email, Union Wireless provides the list of census blocks and associated Federal Information Processing Standards ("FIPS") codes representing the areas in which the Company is availing itself of forbearance. Although Union Wireless believes this information to be accurate, it is possible that some census blocks may have been inadvertently omitted. Union Wireless emphasizes that it elects

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[1] *Lifeline and Link Up Reform and Modernization et al.,* Third Report and Order, Further Report and Order,, and Order on Reconsideration, 31 FCC Rcd 3962 (2016)("*Lifeline Modernization Order*").

[2] *Wireline Competition Bureau Provides Guidance Regarding Filing Procedures for Eligible Telecommunications Carriers Seeking to Invoke Forbearance Granted by Lifeline Modernization Order*, Public Notice, WC Docket No. 11-42, DA 16-1316 (WCB. rel. November 23, 2016) ("*BIAS Forbearance Public Notice*").

[3] Unlike recipients of other types of high-cost support, who were granted forbearance based on census block, FHCS recipients "are not required to offer Lifeline-supported broadband services in their designated service areas." *See* Lifeline Modernization Order, 31 FCC Rcd at 4074 (Para. 311).

forbearance throughout its ETC service area, and will promptly file a supplement with corrections if errors are identified.

Notwithstanding this forbearance filing and in accordance with the *Lifeline Modernization Order*, Union Wireless reserves the right to offer and receive reimbursement for providing Lifeline-supported BIAS to eligible subscribers.[4]

Please contact the undersigned if you have questions.

Sincerely,

Chris Reno, CPA, CGMA
Director of Accounting
Tel.: (307) 782-6131

cc: TelcoLifeline@usac.org

[4] *See id. See also, BIAS Forbearance Public Notice, supra*, at p. 2

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Union Cellular Telephone Company d/b/a Union Wireless
Lifeline BIAS Forbearance Filing

Attachment A
Information Regarding ETC Designation

ETC Name	SAC	State	Designating Authority	Date(s) of Designation
Union Telephone Company d/b/a Union Wireless, d/b/a Union Cellular	519905	WY	Wyoming Public Service Comm'n	11/14/2003

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Attachment B
BIAS Forbearance Census Blocks

[Oversize attachment included with e-mail copy to USAC only]