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December 6, 2018

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: Connect America Fund, WC Docket Nos. 10-90, 14-58, 07-135, and CC Docket No. 01-92

Dear Ms. Dortch:

On behalf of Hamilton County Telephone Co-op ("Hamilton" or "Co-op") I along with our members and employees wish to extend our thanks to the Federal Communication Commission ("FCC" or "Commission") for its consideration of Hamilton's petition for reconsideration filed on May 8, 2018 in the above referenced dockets ("Petition"). As we understand, in the draft order on reconsideration which is scheduled for vote by the FCC at its December open meeting ("*Draft Order*") our request for reconsideration is being denied along with two other petitions for various reasons. Among those reasons, "that it was beyond the scope of for which the reconsideration was sought".

Hamilton can understand this point of view. However, the Co-op does believe that it had no choice to bring this to the Commission's attention as no other mechanism exists for areas that were left behind by inaccurate data filed in the 477. Hamilton reminds the Commission that the Co-op filed an extensive 70 page challenge that included evidence, actual field testing and mapping with absolute and conclusive results, but yet were not adequate to convince the FCC for further review. In fact the challenge was denied because of the choice of only two words out of 70 pages, not at all by the evidence it included.

Hamilton would also like to remind the Commission that it has had numerous meetings, discussions with FCC staff as filed in *ex parte* notices over the last few years learning that the opportunity for correction does not exist. However, these many conversations and filings with the FCC which included evidentiary documentation regarding the non-existence of Wisper or any other competitor in Hamilton's service area did not yield any solution. Accordingly, it appears that by denying Hamilton's Petition without identifying some solution as to how these residences and businesses will receive broadband, it is apparent that the FCC has determined that the "abandoned locations" are just that, "abandoned." Individuals and small businesses in the Co-op's rural service areas with no opportunity to obtain any high-cost universal service support and no opportunity for them to obtain broadband services as enjoyed by urban or funded areas.

While Hamilton is supportive of the Draft Order for other carriers to bring High speed broadband to their rural locations, it is not apologetic for bringing this specific issue to the Commission's attention along with the other two carriers that have areas that are being left behind as a result of inaccurate Form 477 data.

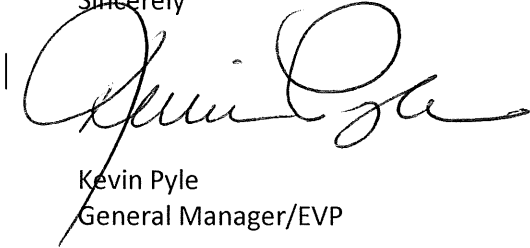
In closing, Hamilton, a 65 year old cooperative is appreciative for the funding it has received to deploy broadband to a portion of unserved areas within its rural service area, but is saddened that it will not be able to modernize most of its network to tomorrow's standards for the remainder of the unserved locations within its boundaries.

While hope is never a guarantee, we do hope that while deliberating over the final text of the order, the FCC will find a solution to fund these abandoned locations so that the Co-op can have the sufficient universal service funding

that the A-CAM is supposed to provide in order to bring broadband to those unserved areas that have been left behind.

HAMILTON COUNTY TELEPHONE CO-OP

Sincerely

A handwritten signature in black ink, appearing to read "Kevin Pyle". The signature is fluid and cursive, with a large initial "K" and "P".

Kevin Pyle
General Manager/EVP