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Kendall Parrish

December 19, 2017

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *Ex Parte* Presentation in CC Docket No. 96-45
Petition of Medicine Park Telephone Company for Waiver of the Definition of "Study Area" of the Appendix-Glossary of Part 36 of the Commission's Rules

Dear Ms. Dortch:

In the above-referenced waiver petition filed by Medicine Park Telephone Company (Medicine Park) in April 2017, Medicine Park provided information concerning the need for the requested waiver and the impact of the waiver on the universal service fund and the NECA pool for special access services. By this written presentation, Medicine Park updates this information to clarify certain statements in its initial Petition and to show the *de minimus* impact of the waiver, if granted by the Commission.

In its initial petition, Medicine Park alleged that its study area, after granting the petition for waiver, would serve approximately 700 access lines. To clarify, the 700 access line figure represents the current number of homes passed by Medicine Park in its current study area. The geographic area which Medicine seeks to include within its study area is currently unserved by any wireline voice or broadband provider. Indeed, the geographic area was what is termed "open territory" under Oklahoma law until the Oklahoma Corporation Commission granted a certificate of convenience and necessity to Medicine Park allowing it to provide wireline service in the area. Having received state authority to serve the area, Medicine Park seeks to expand its study area to include this geographic area within its study area because of its close proximity to Medicine Park's current study area and the city of Lawton, Oklahoma. Lawton is home to Ft. Sill, a U.S. Army base that is home to the United States Army Field Artillery School as well as the Marine Corps' site for Field Artillery MOS school, United States Army Air Defense Artillery School, the 31st Air Defense Artillery Brigade, and the 75th Fires Brigade. Due in part to Ft. Sill's expanding purpose, the area surrounding Ft. Sill continues to grow. Hence, Medicine Park's desire to claim the ability

to expand the scope of its territory in which it provides landline voice and broadband services in this growing area.

As described in the petition, Medicine Park received a Community Connect grant to build facilities necessary to serve planned housing developments and community anchor locations in the expanded geographic area. The area is depicted on that map attached hereto as Exhibit A which also describes the census blocks covered by Medicine Park's petition. Because the initial buildout costs will be funded through grant funds, future operating costs and minimal incremental investment are the only costs Medicine Park expects to incur on an ongoing basis that will have any impact on universal service funds. Medicine Park estimates that the impact to universal service as a result of the expanded study area is less than \$7,500 per year. Because Medicine Park is a small incumbent rate of return LEC, it only gets receives the minimum corporate operations expense allowance. That amount would not change as a result of the grant of the petition to include the new area within Medicine Park's existing study area.

Because Medicine Park intends to buildout the geographic area pursuant to a USDA Community Connect grant, it will comply with the broadband deployment obligations attendant to the grant program rules and requirements. The buildout of broadband will further meet any broadband deployment obligations of which Medicine Park is subject under the Connect America Fund.

In short, the petition for waiver will allow Medicine Park to include the additional geographic area which is currently unserved by any landline provider, within its study area. The petition is filed in anticipation of housing developments that are planned in the area to meet the growth of the nearest city, Lawton, Oklahoma. The expansion of Medicine Park's study area will have a *de minimus* impact on universal service related primarily to operations expenses because the buildout of facilities to serve the area are subject to grant funding and grant funding requirements.

Accordingly, Medicine Park renews its request that the Commission act expeditiously on its pending waiver petition.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed via ECFS. If you have any questions, please do not hesitate to contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "Kendall Parrish", written over a horizontal line.

Kendall Parrish

