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7852 Walker Drive, Suite 200
Greenbelt, Maryland 20770
phone: 301-459-7590, fax: 301-577-5575
internet: www.jsitel.com, e-mail: jsi@jsitel.com

VIA ECFS

January 28, 2015

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

**Re: WC Docket No. 10-90, GN Docket No. 09-51, WC Docket No. 07-135,
WC Docket No. 05-337, CC Docket No. 01-92, CC Docket No. 96-45
WC Docket No. 03-109, WT Docket No. 10-208, WC Docket 12-233
Notice of *Ex Parte* Presentation**

Dear Ms. Dortch:

On January 27, 2015, Todd Crandall of West Kentucky and Tennessee Telecommunications Cooperative (“WK&T”), and John Kuykendall of JSI (collectively, “WK&T representatives”) met by telephone conference with Amy Bender of Commissioner O’Rielly’s office. The subject of discussion was the WK&T Petition for Limited Waiver of the Commission’s intercarrier compensation revenue recovery rules, specifically the 2011 Rate-of-Return Carrier Base Period Revenue.¹

WK&T representatives explained that WK&T was unable to include all of the revenues that it was entitled to include in its baseline due to a system billing omission that occurred during the time period used to calculate the baseline. The Company was able to rectify the billing omission, bill and receive payment. However, the Company had to seek waiver of the March 31, 2012 deadline in order to include the amount in its baseline. The participants then discussed that the petition for waiver has been pending for over two years and asked what could be done to expedite action. Meeting participants further discussed whether the Wireline Competition Bureau could act on the WK&T Petition on delegated authority, or if full Commission action would be required.

¹ See Second Amended Petition of West Kentucky and Tennessee Telecommunications Cooperative Petition for Limited Waiver of 47 C.F.R. § 51.917(b)(ii), WC Docket No. 10-90 *et al.*, filed March 10, 2014 (“WK&T Petition”).

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Please contact the undersigned with any questions.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "John Kuykendall". The signature is written in a cursive style with a large initial "J" and "K".

John Kuykendall
Vice President

cc: Amy Bender