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March 12, 2015

Via ECFS.

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

Re: Petition of Pioneer Telephone Cooperative, Inc. for Waiver of 47 C.F.R.
Sections 36.3, 36.123-126, 36.141, 36.152-57, 36.191 and 36.372-382 to
Unfreeze Part 36 Category Relationships, CC Doc. No. 80-286.

Ex Parte Notice

Dear Ms. Dortch:

On March 11, 2015 Jim Eaton, Nick Kretchmar, Jo Shotwell and I, representing Pioneer Telephone Cooperative, Inc. met with Travis Litman, Legal Advisor to Commissioner Rosenworcel, to discuss Pioneer's pending petition referenced above. Messrs. Eaton and Kretchmar and Ms. Shotwell participated by telephone.

The Pioneer representatives explained that the cooperative froze its separations category relationships in 2001 in accordance with an option provided in the Commission's Order which stated the freeze would last until a comprehensive restructure of the separations rules was adopted or five years, whichever ever came first. Now almost nine years have passed since the time when the Commission assured parties their obligation to maintain the category freeze would end.

Pioneer requests that the Commission act promptly on the pending petition. We emphasized that the year 2015 there is no basis to refuse to allow requesting carriers to recalculate their separations category relationships when they justifiably relied on the Commission's Order to believe they would be able to do so no later than 2006. Further, Pioneer's is one of only two pending requests, despite public discussion of the issue over the last two years.

Please address any questions in this matter to me.

Sincerely yours

David Cosson
Counsel to Pioneer Telephone Cooperative, Inc.

cc: Travis Litman