



**Valley Telephone Cooperative, Inc.**  
VTX Communications, LLC  
VTX Telecom, LLC

**Leonard Beurer**  
Chief Financial Officer

881 E. Hidalgo Ave.  
Raymondville, TX 78580  
956.642.1108 • leonard.beurer@vtx1.net  
www.vtx1.net

April 15, 2015

**VIA ECFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Attention: Wireline Competition Bureau

**Re: Petition for Limited Waiver of 47 C.F.R. § 51.917(b)  
Valley Telephone Cooperative, Inc.  
Connect America Fund, CC Docket No. 01-92, WC Docket Nos. 07-135, 10-90**

Dear Ms. Dortch:

Valley Telephone Cooperative, Inc. (“Valley”) hereby withdraws the above-referenced Petition for limited waiver of Federal Communications Commission rules Section 51.917(b)(7)(ii), 2011 Rate-of-Return Carrier Base Period Revenue. Valley filed in the Texas LECs Petition of March 14, 2014 to include in Base Period Revenue amounts owed by Halo Wireless, Inc.<sup>1</sup>

Valley chose not to file in a bankruptcy proceeding on the basis of a cost-benefit analysis. Valley is a cost company subject to the corporate operations and expense cap and considered in its business decision that the expense of a bankruptcy proceeding would not have been recoverable, and that no revenue would have been realized from such a proceeding. Therefore, Valley would not meet the bankruptcy condition the Commission established in its previously adopted Halo Order.<sup>2</sup>

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<sup>1</sup> Petition of Big Bend Telephone Company, Brazoria Telephone Company, Eastex Telephone Cooperative, Inc., Industry Telephone Company, Livingston Telephone Company, Inc., Mid-Plains Rural Telephone Cooperative, Inc., Riviera Telephone Company, Inc., and Valley Telephone Cooperative, Inc. for Limited Waiver of 47 C.F.R. § 51.917(c), CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WC Docket Nos. 03-109, 05-337, 07-135, 10-90, WT Docket No. 10-208 (filed Mar. 14, 2014) (“Texas LECs Petition”). Reference to § 51.917(c) in Texas LECs Petition is now numbered as § 51.917(b)(7)(ii).

<sup>2</sup> Connect America Fund, WC Docket No. 10-90, Developing a Unified Intercarrier Compensation Regime, CC Docket No. 01-92, Petitions for Waiver of Section 51.917(b)(7) of the Commission’s Rules, Order, FCC 14-121 rel. Aug. 7, 2014 (“Halo Order”).

Valley reserves the right to re-file without prejudice its Petition with a request for waiver of the bankruptcy condition as new circumstances may warrant.

Please contact the undersigned with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Leonard Beurer", with a long horizontal flourish extending to the right.

Leonard Beurer  
Chief Financial Officer  
Valley Telephone Cooperative, Inc.

Enclosures

cc: Victoria Goldberg, Wireline Competition Bureau