

David Cosson
ATTORNEY AT LAW

5151 Wisconsin Ave, N.W.
Washington, D.C. 20016

Telephone (202) 333-5275

April 22, 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 April 22, 2015 Richard Ruhl, Jim Eaton, Nick Kretchmar, Jo Shotwell and I, representing Pioneer Telephone Cooperative, Inc. met with Julie Veach, Deena Shetler, Pamela Arluk, Mike Jacobs and John Hunter of the Wireline Competition Bureau, to discuss Pioneer's pending petition referenced above. Messrs. Eaton and Kretchmar and Ms. Shotwell participated by telephone. The attached map of Pioneer's service area was provided to Ms. Veach.

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 agreed to update its calculations with respect to the effect that could be expected from unfreezing its category relationships, to consult with NECA to determine whether those effects might impact NECA switched access or special access tariff rate levels, and to report back to the Bureau.

Please address any questions in this matter to me.

Sincerely yours

David Cosson
Counsel to Pioneer Telephone Cooperative, Inc.

Attachment

cc:

Julie Veach

Deena Shetler

Mike Jacobs

Pamela Arluk

John Hunter