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April 23, 2015

Via ECFS.

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

Re: Connect America Fund, WC Docket No. 10-90

Dear Ms. Dortch:

On April 22, 2015, Richard Ruhl, CEO of the Pioneer Telephone Cooperative, Inc. (“Pioneer”), Stephen Kraskin and I met with Carol Mattey, Suzanne Yelen and Alexander Minard of the Wireline Competition Bureau to discuss Pioneer’s interest in utilizing the Alternative Connect America Cost Model (“ACAM”) to determine the USF support available to Pioneer to expand the provision of high-speed broadband connectivity within its service area.

Mr. Ruhl described Pioneer’s wireline, wireless and broadband operations as illustrated by the attached maps. He explained that while Pioneer, a community owned cooperative, has deployed broadband to many of its member-subscribers, there remains a substantial number residing in high-cost to serve locations to which it is financially prohibitive to provide high speed broadband connectivity in the absence of adequate and predictable support from the USF.

In contrast both to the legacy mechanisms utilized to distribute USF to rural rate-of-return carriers and to proposals to revise and maintain those mechanisms, the ACAM more accurately identifies the USF support needed to expand high-speed broadband connectivity within Pioneer’s service area. Mr. Ruhl noted his understanding that the Commission is considering adoption of the utilization of the ACAM to determine USF distribution as an option available to rate-of-return carriers that would be implemented through a transition period. Mr. Ruhl indicated that while Pioneer had no objection to the use of a reasonable transition period, Pioneer and other rural providers require certainty of the support amount available in order to plan and initiate the expansion of provision of high-speed broadband service. Moreover, we noted that build out requirements must be rationally aligned with the amount of available USF support in order to avoid unfunded and unachievable mandates.

Mr. Ruhl also expressed Pioneer's recognition that support recipients must be accountable to the Commission and suggested that a reasonable means to achieve accountability would be the submission of an annual report by each USF recipient carrier describing with specificity the number of additional locations at which the carrier has utilized USF support to deploy high speed broadband. Finally, Pioneer agrees that support should not be tied to a particular technology so long as the specific universal service performance metrics established by the Commission are met.

Please contact me with any questions on this matter.

Sincerely yours

David Cosson  
Counsel to Pioneer Telephone Cooperative, Inc.

Attachments

cc:

Carol Matthey  
Suzanne Yelen  
Alexander Minard