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VIA ECFS

July 31, 2015

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW  
Washington, DC 20554

**RE: Amendment to Leaco Rural Telephone Cooperative, Inc. Request For Limited Waiver And Extension Of Mobility Fund Phase I Public Interest Obligations, WC Docket No. 10-90 and WT Docket No. 10-208**

Dear Ms. Dortch:

By this letter, Leaco Rural Telephone Cooperative, Inc. (“Leaco”) hereby amends its Request For Limited Waiver And Extension Of Mobility Fund Phase I Public Interest Obligations<sup>1</sup> with regard to Study Area Code (“SAC”) 498004,<sup>2</sup> one of the six SACs for which Leaco requested the waiver and extension of the two-year deadline to construct a third generation (“3G”) network and submit drive test data reports for Mobility Fund Phase I (“MFI”) support. Leaco has now completed construction and submitted drive test data for SAC 498004, reporting that Leaco’s 3G network has exceeded the 75% coverage requirement for eligible unserved roads.

Leaco completed network construction in SAC 498004 on July 8, 2015, just one month after its two-year deadline of June 8, 2015. On July 21, 2015, Leaco submitted the Payment 3 Form 690 to the Universal Service Administrative Company (“USAC”) for SAC 498004, reporting 3G broadband and voice coverage for 85% of eligible unserved roads. The Payment 3 filing requests disbursement of MFI funds for the difference between the initial one-third

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<sup>1</sup> See Leaco Rural Telephone Cooperative, Inc. Request For Limited Waiver And Extension Of Mobility Fund Phase I Public Interest Obligations, *Connect America Fund, Universal Service Reform – Mobility Fund*, WC Docket No. 10-90 and WT Docket No. 10-208 (file Apr. 16, 2015) (“Waiver Request”).

<sup>2</sup> Census Tract 35005001400.

disbursement for SAC 498004 and the corresponding amount of support for the 85% coverage reported.

In the Waiver Request, Leaco requested a waiver and extension of time until December 5, 2015, in which to complete construction and provide the drive-test data in the six waiver tracts. Leaco hereby amends the Waiver Request with respect to SAC 498004 to request a limited waiver and extension until July 21, 2015.<sup>3</sup> Leaco requests that the Commission act expeditiously on the Waiver Request with regard to SAC 498004, and that the Commission grant the request and direct USAC to proceed with the MFI validation and disbursement process for this SAC.

Leaco has worked diligently to overcome many hurdles in deploying its 3G network in SAC 498004, and the timing of Leaco's Payment 3 filing for this SAC demonstrates that Leaco only required a brief extension of the two-year deadline to complete this MFI project.<sup>4</sup> Leaco is serving the public interest and the Commission's goals by providing voice and broadband services to the previously unserved areas of rural, southeastern New Mexico. There is good cause to grant the Waiver Request with respect to Leaco's completion of network construction and submission of supporting drive test data for SAC 498004.

Please contact the undersigned counsel if you have any questions.

Respectfully submitted,



Gregory W. Whiteaker  
Robin E. Tuttle

*Counsel for Leaco Rural Telephone  
Cooperative, Inc.*

cc (via electronic mail)  
Sue McNeil  
Margaret Wiener  
Gary Michaels  
Rita Cookmeyer

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<sup>3</sup> The Waiver Request otherwise remains intact and pending for the five remaining SACs.

<sup>4</sup> Leaco continues to work diligently toward completion of the MFI projects in the five remaining SACs covered in the Waiver Request, but notably continues to be hampered by inaction from the Bureau of Land Management on applications for cell site construction at sites that are critical for deployment of the network.