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October 22, 2015

EX PARTE PRESENTATION

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: Tri-County Telephone Association, Inc., Petition for Waiver of
Accounting Rules, WC Docket No. 08-239.

Dear Ms. Dortch:

On October 20, 2015, on behalf of Tri-County Telephone Association, Inc. (“TCT”), I spoke by telephone with Pamela Arluk, John Hunter, Amy Goodman, Richard Kwiatkowski, and Douglas Sloten, all of the Wireline Competition Bureau, concerning the above-captioned proceeding.

I summarized the petition for waiver that has been filed in the docket. I informed the participants that TCT in 2010 began offering DSL on a permissively detariffed basis consistent with the requirements of *Appropriate Framework for Broadband Access to the Internet Over Wireline Facilities et al.*, CC Docket Nos. 02-33, 01-337, 95-20, 98-10, WC Docket Nos. 04-242, 05-271, Report and Order and Notice of Proposed Rulemaking, 20 FCC Rcd 14853, 14860 n.15 (2005) (*Wireline Broadband Deregulation R&O*), *aff’d sub nom. Time Warner Telecom, Inc. v. FCC*, 507 F.3d 205 (3d Cir. 2007). TCT has been making public interest fund contributions on the basis of digital subscriber line (“DSL”) revenues since 2010. The waiver requested would permit the company to make entries to its regulated accounts to include all DSL costs associated with providing this service, consistent with permissively detariffed regulatory treatment of DSL service.

The Commission’s action in *Protecting and Promoting the Open Internet*, GN Docket No. 14-28, 30 FCC Rcd. 5601, ¶¶ 460, 504 (2015), specifically permitted carriers to continue to offer DSL pursuant to the 2005 permissive detariffing scheme.

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I requested that the staff proceed to decide the petition and offered to provide any additional information that the Commission may require.

Pursuant to 47 C.F.R. § 1.1206, please include this ex parte filing in the above-referenced docket.

Sincerely,

/s/ Gregory J. Vogt

Gregory J. Vogt
Counsel for Tri-County Telephone Association, Inc.

cc: Pamela Arluk
John Hunter
Amy Goodman
Richard Kwiatkowski
Douglas Slotten