

REDACTED FOR PUBLIC DISCLOSURE

**David Cosson**  
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By Courier

November 9, 2015

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St., S.W.  
Washington, D.C. 20554

Accepted / Filed

NOV - 9 2015

Federal Communications Commission  
Office of the Secretary

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Re: Petition Of Pioneer Telephone Cooperative, Inc. For Waiver Of 47 C.F.R. Sections 36.3, 36.123-126, 36.141, 36.152-157, 36.191 And 36.372-382 To Unfreeze Part 36 Category Relationships. CC Docket No. 80-286. CC Docket No. 80-286

Dear Ms. Dortch:

Enclosed are an two copies of the redacted version of an *ex parte* notification of Pioneer Telephone Cooperative dated today pursuant to the Protective Order in this proceeding, DA 13-1009. Please mark the additional copy of this filing as "received" and return to the courier.

Please direct any questions regarding this request to me.

Respectfully submitted

David Cosson  
Counsel to Pioneer Telephone Cooperative, Inc.

Attachment

**REDACTED FOR PUBLIC INSPECTION**

**David Cosson**  
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Via ECFS.

Federal Communications Commission  
Office of the Secretary

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 November 5, 2015 Jim Eaton, Chad Duval, Jo Shotwell, Sharon Minor and I, representing Pioneer Telephone Cooperative, Inc. met with Matthew DelNero, Kris Monteith, Pamela Arluk, John Hunter and Douglas Sloten of the Wireline Competition Bureau to discuss Pioneer's pending petition referenced above. Messrs. Eaton and Duval and Mss. Shotwell and Minor participated by telephone.

The Pioneer representatives renewed their request that the Commission act promptly on the pending petition. We noted that when the cooperative froze its separations category relationships in 2001 the Commission's Order stated that the freeze would last until a comprehensive restructure of the separations rules was adopted or five years.

Pioneer provided the attached updated information regarding the impacts of the freeze on its interstate revenue requirements based on its completed 2014 cost study.<sup>1</sup> The impact has increased by 64% since its petition was filed in early 2013. This data has been provided to NECA. Pioneer concurs in NECA's request that any grant of its petition be adopted prior to March 2016 with an effective date of July 2016.

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<sup>1</sup> Confidential designation of this attachment is requested pursuant to the Protective Order in this proceeding, DA 13-1009.

In response to staff request, Pioneer will provide additional analysis with respect to the relationship between interstate and intrastate operations.

Please address any questions in this matter to me.

Sincerely yours

David Cosson  
Counsel to Pioneer Telephone Cooperative, Inc.

Confidential Attachment Redacted

cc:

Matthew DelNero

Kris Montieth

Pamela Arluk

John Hunter

Doug Slotten