

REDACTED FOR PUBLIC INSPECTION

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November 16, 2015

Via ECFS.

Mr. Matthew DelNero
Chief, Wireline Competition Bureau
Federal Communications Commission
445 12th Street SW
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 Mr. DelNero:

At our November 5, 2015 meeting Pioneer agreed to a staff request to provide an estimate of the projected impact a grant of its Petition would have on its intrastate rate of return. The attachments provide intrastate rate of return calculations based on the 2014 cost study using both frozen and unfrozen categories. As was the case with Eastex Telephone Cooperative,¹ the similar petition which the Bureau granted in 2012, Pioneer's local intrastate rates are not cost based and its intrastate switched and special access rates mirror its interstate rates.

¹ *Petition of Eastex Telephone Cooperative, Inc. to Unfreeze Part 36 Category Relationships*, Order, n. 54, 27 FCC Rcd 6357 (WCB 2012). Gila River Telecommunications, Inc., for which the Commission granted a similar petition in 2010, is a tribally owned company not subject to state rate regulation. *Petition by Gila River Telecommunications, Inc. Pursuant to 47 C.F.R. Sections 36.3, 36.123 - 126, 36.152-157, and 36.372-382 for Commission Approval to Unfreeze Part 36 Category Relationships*, 25 FCC Rcd 17459 (2012).

Pioneer renews its request that the Commission act promptly to grant its pending petition, with an effective date of July 2016.

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

Douglas Slotten