

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Universal Service High-Cost Filing Deadlines)	WC Docket No. 08-71
)	
Federal-State Joint Board on Universal Service)	CC Docket No. 96-45
)	
Petition of MTA Communications, LLC d/b/a MTA Wireless/Matanuska-Kenai, Inc. for Waiver of Sections 54.307 and 54.903 of the Commission’s Rules)	
_____)	

**PETITION FOR RECONSIDERATION AND WAIVER OF
MTA COMMUNICATIONS, LLC D/B/A MTA WIRELESS/MATANUSKA-KENAI, INC.**

Pursuant to section 1.106 of the Federal Communications Commission’s (“Commission” or “FCC”) rules,¹ MTA Communications, LLC d/b/a MTA Wireless/Matanuska-Kenai, Inc. (“MTAC”), respectfully submits this Petition for Reconsideration and Waiver. The Commission and the Wireline Competition Bureau (“Bureau”) issued a streamlined resolution of requests for review, requests for waiver, and petitions for reconsideration of decisions related to actions taken by the Universal Service Administrative Company (“USAC”) in decision DA 15-1368, released November 27, 2015, denying MTAC’s request for waiver.²

¹ 47 C.F.R. § 1.106.

² *Universal Service High Cost Filing Deadlines, et al.*, WC Docket Nos. 02-60, 96-45, 08-71, CC Docket Nos. 96-45, 02-6, Streamlined Resolution of Requests Related to Actions by the Universal Service Administrative Company, DA 15-1368 (rel. Nov. 27, 2015) (“*FCC Order*”).

MTAC requested a waiver of the March 30, 2015 FCC Form 525 high-cost line count filing deadline set forth in sections 54.307 and 54.903 of the Commission's rules.³ MTAC made a clerical error by inadvertently failing to check the Interstate Common Line Support ("ICLS") box on Form 525 when it submitted its line count information on March 24, 2015, six days before the March 30, 2015 deadline.⁴ The ICLS Worksheet was included with the March 24, 2015 filing but the data was removed when the checkbox was not checked.⁵ MTAC discovered its clerical error in August 2015 and promptly contacted the Universal Service Administrative Company ("USAC").

On November 27, the Bureau denied MTAC's waiver request, stating that MTAC previously received a waiver of high-cost filing deadlines and committed to instituting procedures to avoid missing future deadlines.⁶ MTAC states that it instituted reasonable measures designed to prevent missing future deadlines.⁷ MTAC filed its March 2015 line count filing ahead of the deadline, however a clerical error left a single check-box unmarked which resulted in data not being transmitted to USAC. The Commission failed to address the harm to MTAC's customers caused by MTAC's loss of approximately \$425,000 in high-cost federal universal service support. MTAC seeks reconsideration of the denial of its waiver request and

³ 47 C.F.R. §§ 54.307, 54.903.

⁴ See *Universal Service High-Cost Filing Deadlines, Federal-State Joint Board on Universal Service*, WC Docket No. 08-71, CC Docket No. 96-45, Petition of MTA Communications, LLC, d/b/a MTA Wireless/Matanuska-Kenai, Inc., for Waiver of Sections 54.307 and 54.903 of the Commission's Rules, before the FCC (Oct. 6, 2013) ("*Waiver Request*") at Exhibit A.

⁵ See *Waiver Request* at Exhibit B.

⁶ *FCC Order* at note 13 ("MTA Communications, LLC d/b/a MTA Wireless/Matanuska-Kenai, Inc. (MTAW) did not provide Interstate Common Line Support line counts in its Form 525 filing due March 30, 2015. MTAW has previously received a waiver of high-cost filing deadlines based in part on a commitment to put procedures in place to avoid missing future deadlines.").

⁷ See Affidavit of Wanda Tankersley, attached hereto as Exhibit A.

requests that the Commission grant the waiver and direct USAC to accept the company's amended March 30, 2015 FCC Form 525 line count filing.

I. STATEMENT OF FACTS.

MTAC is an Alaska company that provides an array of telecommunications services to high-cost customers in Alaska including, but not limited to: (1) traditional voice grade access to the public switched network; (2) local usage; (3) access to operator, directory assistance and emergency services; and (4) wireless cellular services, including a locally-based wireless alternative. MTAC has upgraded most of its network to state-of-the-art code division multiple access technology. MTAC has provided high quality telecommunications services to Alaska customers since 1991 and has received high-cost federal universal service funding since 2005. Currently, MTAC's service area extends across nearly 9,000 square miles and the company serves almost 8,000 high-cost Alaska telecommunications customers in approximately nineteen communities.⁸ MTAC operates a reliable network, transmits a high-quality signal, and provides high-quality service. MTAC implemented multiple back-up and redundancy features that allow it to assure reliable, safe and efficient telecommunications service to its rural Alaska customers. In remote areas, MTAC provides essential safety services for customers in distress, some of whom are engaged in outdoor activities for whom MTAC is the only signal they can receive.

MTAC has timely filed all of its FCC Form 525 high-cost line count filings since 2004, when the company first began receiving high-cost funding, with one exception.⁹ MTAC

⁸ The communities in which MTAC provides high-cost telecommunications services include, but are not necessarily limited to, Big Lake, Butte, Chickaloon, Deshka, Glenn Highway Flats, Goose Bay/Port McKenzie, Hatcher Pass, Meadow Lakes, Houston, Palmer, Petersville, Sheep Mountain, South Big Lake, Sutton, Skwenta, Talkeetna, Trapper Creek, Wasilla and Willow.

⁹ See *Universal Service High-Cost Filing Deadlines, Federal-State Joint Board on Universal Service*, WC Docket No. 08-71, CC Docket No. 96-45, Petition of MTA Communications, LLC, d/b/a MTA Wireless/Matanuska-Kenai, Inc., for Waiver of Sections 54.307 and 54.802(A) of the Commission's Rules, before the FCC (Nov. 6, 2013) ("*2013 Waiver Request*").

requested a waiver in 2013 after inadvertently failing to file its Form 525 line count filing. The Commission granted that request, noting that “MTAC promptly took action to file [its] line count data after learning [it] had missed the initial deadline.”¹⁰ The Commission additionally based its decision on MTAC’s commitment to revise internal procedures to ensure that its filings are submitted timely.¹¹

To be clear, MTAC timely filed its FCC Form 525 on March 24, 2015, well before the March 30, 2015 deadline.¹² MTAC dutifully verified all of the data submitted with the March 30, 2015 FCC Form 525, but after exhaustive investigation with USAC, MTAC inadvertently failed to verify that all of the checkboxes on the FCC Form 525 cover sheet were properly checked. To the best of MTAC’s knowledge the missing checkbox caused the ICLS Worksheet to be filed with USAC without line count data. The worksheet appeared to be completed during the certification. Upon discovering the error when its monthly disbursement from USAC was \$141,653 short of expected, MTAC conducted an internal review and promptly contacted USAC to determine the cause.¹³

During discussions with USAC officials, MTAC learned that the external USAC portal and the internal USAC portal do not have similar interfaces. The internal USAC interface has a summary sheet that allows the user to instantly confirm that all relevant tabs have been checked.¹⁴ The external interface that MTAC and other similarly situated carriers use lacks a

¹⁰ See *Universal Service High-Cost Filing Deadlines, Federal-State Joint Board on Universal Service*, WC Docket No. 08-71, CC Docket No. 96-45, Order, before the FCC (rel. Mar. 27, 2014) (“*MTA Waiver Request Order*”).

¹¹ *MTA Waiver Request Order* at 6 (“We rely on both Cordova and MTAW to fulfill their commitments to adhere to their revised filing procedures, and do not anticipate either carrier will seek similar waivers again.”).

¹² See Exhibit A, p. 2.

¹³ MTA’s disbursement report was dated August 28, 2015 and MTA contacted USAC on September 14, 2015.

¹⁴ MTA continued to investigate how the box could not be checked, but the online interface accepted the line count data worksheet to prevent a repeat. See Email exchange between MTAC Regulatory Specialist Sonja Nelson and

summary sheet. MTAC must check each tab and make sure the appropriate box is checked in addition to the appropriate data being included. The lack of a summary sheet does not excuse MTAC's error, but it is easy to understand how a tab by tab review may miss one small box. The result of failing to check the box is a draconian all or nothing result that MTAC respectfully requests that the Commission waive.

II. THE COMMISSION'S STREAMLINED ORDER MADE A FACTUALLY INCORRECT INFERENCE ABOUT MTAC'S CONDUCT.

In the Commission's streamlined order denying MTAC's waiver petition, the Commission noted that MTAC received its previous waiver "based in part on a commitment to put procedures in place to avoid missing future deadlines."¹⁵ The Commission then quoted precedent where the Commission denied waivers to petitioners who missed filing deadlines previously and failed to put in place sufficient procedures *to avoid missing subsequent deadlines* (emphasis added).¹⁶ However, this precedent is inapplicable to MTAC's situation because MTAC filed its FCC Form 525 filing prior to the filing deadline. MTAC followed all of the procedures that it put in place as a result of the 2013 waiver. An unrelated clerical error caused the information to be deleted, not MTAC's timeliness. The Commission should not deny a waiver petition from a carrier solely because that carrier previously filed a waiver petition under different circumstances.

USAC Staff Christina Cunningham discussing the clerical error and the internal MTAC process implemented to prevent such errors, attached hereto as Exhibit B.

¹⁵ *FCC Order* at 5, note 13.

¹⁶ *FCC Order* at 5, note 13 (Citing precedent where the FCC "[denied] waiver petitions in instances where petitioners missed high-cost filing deadlines previously and "should have put in place sufficient procedures to avoid missing subsequent high-cost filing deadlines.").

The Commission suggests that MTAC failed to implement sufficient internal processes following the 2013 waiver.¹⁷ MTAC instituted robust internal processes to make sure that Form 525 filings are made on time and completed correctly. MTAC now separates the function of compliance (regulatory specialist) and certification (Chief Financial Officer).¹⁸ Rather than place all of the responsibility in one person, there is redundancy built into the system. In addition to process, MTAC now completes and files the Form 525 with USAC well in advance of the deadline in case there is a problem and the filing is rejected. Unfortunately, this precaution did not prove effective since the system did not recognize the data submitted properly because one box was not checked on the form. The only additional precaution that MTAC can and will implement is to print a hard copy of the form to check for problems that are not easily discernable on the online portal. MTAC is committed to adding this step to its process, but the mistake under discussion was so minor, MTAC respectfully asserts that a waiver is appropriate and in the public interest.

III. GOOD CAUSE EXISTS FOR THE COMMISSION TO WAIVE SECTIONS 54.307 AND 54.903 OF ITS RULES IN THIS INSTANCE.

The Commission may waive its rules for good cause shown.¹⁹ Specifically, the Commission may exercise its discretion to waive a rule where the particular facts at issue make strict compliance with the rule inconsistent with the public interest.²⁰ The Commission may take into account considerations of hardship, equity, or more effective implementation of overall

¹⁷ *FCC Order* at 5.

¹⁸ *See* Exhibit A.

¹⁹ 47 C.F.R. § 1.3.

²⁰ *WAIT Radio v. FCC*, 418 F.2d 1153, 1157 (D.C. Cir. 1969), *cert. denied*, 409 U.S. 1027 (1972) (“*WAIT*”); *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) (“*Northeast Cellular*”).

policy on an individual basis.²¹ In sum, a waiver of a filing deadline is appropriate when special circumstances warrant a deviation from the general rule and such deviation will serve the public interest.²²

The Commission previously found that good cause exists to waive filing deadlines where the petitioning party demonstrates that the missed deadline was the result of a minor ministerial, clerical or procedural error.²³ The Commission has also held that good cause exists when the petitioning party promptly remedies its failure to timely file and revises its internal procedures to ensure compliance.²⁴ Consistent with Commission precedent, a waiver is justified in this case. Absent a waiver, MTAC will lose approximately \$425,000 in high-cost federal universal service funding. These funds are critical to MTAC's ability to serve its high-cost Alaska customers and the loss of such funding would be detrimental to the public interest. Failure to receive these funds would limit the telecommunications choices and mobility available to rural Alaska communities and compromise the ability of MTAC's customers to access critical health and safety services when away from their residences.

Good cause exists in this case because MTAC timely filed the Form 525 prior to the March 30, 2015 deadline. MTAC inadvertently failed to check the box for ICLS on the Form 525, which MTAC believes caused the ICLS worksheet to report a zero line count and resulted in MTAC's loss of approximately \$425,000 in high-cost federal support. Upon learning of the mistake, MTAC immediately took steps to rectify the error. It would be unjust to MTAC and

²¹ *WAIT*, 418 F.2d at 1159; *Northeast Cellular*, 897 F.2d at 1166.

²² *NetworkIP, LLC v. FCC*, 548 F.3d 116, 127-28 (D.C. Cir. 2008); *Northeast Cellular*, 897 F.2d at 1166.

²³ See *In the Matter of Petitions for Waiver of Universal Service High-Cost Filing Deadlines, et al.*, WC Docket No. 08-71, Order, DA 13-2094, (rel. Oct. 29, 2013) at para. 7.

²⁴ See, e.g., *In the Matter of Petitions for Waiver of Universal Service High-Cost Filing Deadlines, et al.*, WC Docket No. 08-71, CC Docket No. 96-45, Order, DA 10-107 (rel. Jan. 22, 2010) at para. 22.

MTAC's customers for a single, clerical mistake to deprive MTAC of approximately \$425,000. MTAC took all reasonable steps to correct this problem shortly after learning of it. MTAC reacted as quickly as possible after learning that its ICLS data was not transmitted. Thus, hardship and equity considerations support the grant of MTAC's requested waiver.²⁵

IV. MTAC'S ERROR WAS A MINOR TECHNICAL ERROR.

MTAC timely submitted its FCC Form 525 before the March 30, 2015 deadline. Unfortunately, the USAC portal that MTAC uses to submit the Form 525 data does not contain an external verification that would allow MTAC to confirm information was correctly submitted. MTAC's correspondence with USAC noted that USAC was able to discern there was missing data in under 10 seconds, but MTAC had no knowledge of the missing information until its high-cost funding was significantly below expectations.

An "all or nothing" approach to high-cost funding is inappropriate if the USAC portal does not provide a method for carriers to verify that their information was correctly submitted. There is little reason why the internal USAC portal should show USAC that the carrier's information and verifications were incomplete while the external portal withholds that information. Such a system leaves carriers in the position of believing they correctly submitted their data until their high-cost support funding is significantly below expectations. MTAC urges the Commission and USAC to modify the USAC portal so that both USAC and carriers can see the same verification of submission.

²⁵ *In the Matter of Federal-State Joint Board on Universal Service, et al.*, CC Docket No. 96-45, Order, DA 06-2584 (rel. Dec. 28, 2006) at para. 5 (finding that "[i]n this case, . . . considerations of hardship and equity – as well as North River's longstanding history or submitting timely data – weigh in favor of granting the requested waiver" and stating that previous waivers had been granted to "ensure that consumers in all regions of the Nation, including low-income consumers and those in rural, insular, and high-cost areas, have access to telecommunications and information services.").

V. MTAC HAS IMPLEMENTED ADDITIONAL INTERNAL CONTROLS TO PREVENT THIS TYPE OF ERROR FROM REOCCURRING.

MTAC emphasizes that upon learning that its line count information had not been properly received by USAC and the Commission, MTAC conducted an internal review and promptly contacted USAC to determine the cause.²⁶ After discovering that the checkbox resulted in an incorrect filing, MTAC reviewed and modified its internal procedures. Specifically, MTAC developed an internal procedure that requires MTAC to submit FCC Form 525 several days prior to the filing deadline so that additional MTAC personnel can verify that the proper information was received by USAC. This internal procedure is in addition to the procedures implemented by MTAC as a result of the 2013 waiver request. MTAC fully understands the importance of submitting timely and complete filings to USAC and is implementing this procedure to ensure that future line count filings are made in complete accordance with the Commission's rules.

CONCLUSION

The loss of approximately \$425,000 in high-cost funding would cause MTAC and its customers undue hardship. The loss of this funding would result in the decreased availability of telecommunications services to high-cost customers in Alaska and compromise access to critical health and safety services. The Commission's Order relied on inapplicable precedent to deny the MTAC petition. MTAC timely filed its Form 525, but a clerical and technical error caused USAC not to receive the appropriate data. For the foregoing reasons, MTAC respectfully requests that the Commission promptly grant this petition for reconsideration of MTAC's petition for waiver of sections 54.307 and 54.903 of the FCC's rules and direct USAC to accept the company's amended March 30, 2015 FCC Form 525 line count filing.

²⁶ MTA's disbursement report was dated August 28, 2015 and MTA contacted USAC on September 14, 2015.

EXHIBIT A

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Universal Service High-Cost Filing)	WC Docket No. 08-71
Deadlines)	
)	
Federal-State Joint Board on Universal)	CC Docket No. 96-45
Service)	
)	
Petition of MTA Communications, LLC d/b/a)	
MTA Wireless/Matanuska-Kenai, Inc. for)	
Waiver of Sections 54.307 and 54.903 of the)	
Commission's Rules)	
_____)	

AFFIDAVIT OF WANDA TANKERSLEY

STATE OF ALASKA)
)SS.
BOROUGH OF MATANUSKA)

Wanda Tankersley, after being duly sworn, states the following:

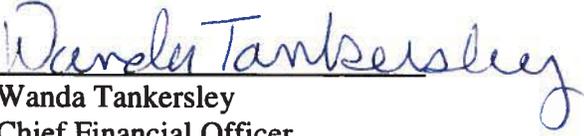
1. I have personal knowledge of the facts and information set forth in this Affidavit and I am competent to testify to these facts if called as a witness.

2. I am the Chief Financial Officer of Matanuska Telephone Association, Inc. Matanuska Telephone Association, Inc. is the sole member of MTA Communications, LLC d/b/a MTA Wireless/Matanuska-Kenai, Inc. ("MTAC"). Acting on behalf of MTAC, I have read the Petition for Reconsideration to which this Affidavit is attached. I have knowledge of the facts stated in the Application and those facts are true to the best of my knowledge and belief.

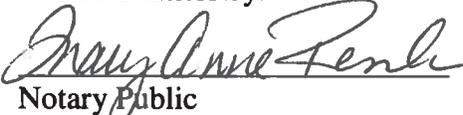
3. MTAC made a clerical error by inadvertently failing to check the Interstate Common Line Support (“ICLS”) box on Form 525 when it submitted its line count information on March 24, 2015. The ICLS line count worksheet was completed as required.

4. As part of its Waiver Request in 2013, MTAC developed internal procedures to prevent MTAC from missing filing deadlines. Specifically, MTAC requires that a second individual monitor MTAC’s internal tracking system and confirm that all line count filings marked as complete in the system have actually been filed with USAC. MTAC also requires that the form be completed by the regulatory specialist and certified as complete and correct by the Chief Financial Officer.

5. MTAC filed its March 2015 FCC Form 525 on March 24, 2015, six days before the March 30, 2015 deadline.


Wanda Tankersley
Chief Financial Officer

The foregoing instrument was acknowledged before me this 10 day of December, 2015 by Wanda Tankersley.


Notary Public

My Commission Expires: 3-23-19

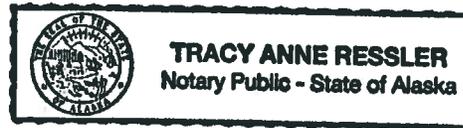


EXHIBIT B

From: Christina Cunningham [<mailto:ccunningham@usac.org>]
Sent: Tuesday, December 8, 2015 8:26 AM
To: Sonja Nelson <snelson@mta-telco.com>
Subject: RE: Form 525 Waiver Instructions

Sonja,
Thank you, I did have a nice Thanksgiving, I hope you enjoyed yours as well.

Unfortunately, as we were helping the FCC gather information for the waiver request, I did notice that I had misspoke during our phone conversation about the external-facing site having a Submission Log page to indicate filed funds – that page is internal only. I would advise the person filing the line counts to verify each fund tab in the filing to make sure that they are updated properly. As such, I don't have a screenshot I can provide to illustrate this as your experience differs from mine while entering form data.

Your new process for Form 525 data entry looks pretty good to me. I would advise that the person who enters the line counts into the system also view/print the uncertified Form (PDF) to review the line counts prior to certification. However, printing and doing a manual verification of entered data after certifying the form is also good practice.

In addition, I would first look on the cover page, as a cursory review, to make sure the check marks are properly indicating what the filing contains, original or revised filing and appropriate funds checked (see screen shot):

(12) Mechanism for which you are requesting support:	(13) Lines Reported as of:	(14) Type of Filing		(15) W
		Original	Revision	
High Cost Loop Support (HCL)	Dec 31, 2014	✓		Comple
Local Switching Support (LSS)	Dec 31, 2014	✓		Comple
Interstate Common Line Support (ICLS)	Dec 31, 2014	✓		Comple
High Cost Model Support (HCM)	Dec 31, 2014			Comple
Interstate Access Support (IAS)	Mar 31, 2015			Comple

Next, I would make sure someone skim through the line counts to make sure all fund which are checked have non-zero line counts associated on that fund page (see screenshot):

INTERSTATE COMMON LINE SUPPORT (ICLS) LINE COUNT WORKSHEET

(2) USAC Service Provider Identification Number (SPIN):	143000432
(3) Company Study Area Code:	619003
(4) Study Area Name:	MATANUSKA-KENAI, INC. - CL
(13) Lines Reported as of:	Dec 31, 2014
(14) Type of Filing:	Original

Line Count Data for Path 1, 2 & 3 Carriers

Complete one row for each disaggregation zone.

(24) Incumbent Carrier Name	(25) Incumbent Carrier SAC	(26) ETC Designation	(27) Path Designation	(28) Disaggregation Zone Name	(29) Wire Center CLLI Code	(30)
MATANUSKA TEL ASSOC	613015	Y	3			
MATANUSKA TEL ASSOC	613015	Y	3	Big Lake Zone 2	BGLKAKXA	
MATANUSKA TEL ASSOC	613015	Y	3	Cantwell Zone 2		
MATANUSKA TEL ASSOC	613015	Y	3	Chugiak Zone 1		
MATANUSKA TEL ASSOC	613015	Y	3	Chugiak Zone 2		
MATANUSKA TEL ASSOC	613015	Y	3	Eagle River Zone 1		
MATANUSKA TEL ASSOC	613015	Y	3	Eagle River Zone 2		
MATANUSKA TEL ASSOC	613015	Y	3	Palmer Zone 1		
MATANUSKA TEL ASSOC	613015	Y	3	Palmer Zone 2		
MATANUSKA TEL ASSOC	613015	Y	3	Talkeetna Zone 1		
MATANUSKA TEL ASSOC	613015	Y	3	Talkeetna Zone 2		
MATANUSKA TEL ASSOC	613015	Y	3	Tyonek Zone 2		
MATANUSKA TEL ASSOC	613015	Y	3	Wasilla Zone 1		
MATANUSKA TEL ASSOC	613015	Y	3	Wasilla Zone 2		
MATANUSKA TEL ASSOC	613015	Y	3	Willow Zone 2		

From: Sonja Nelson [<mailto:snelson@mta-telco.com>]
 Sent: Monday, December 07, 2015 1:30 PM
 To: Christina Cunningham
 Subject: RE: Form 525 Waiver Instructions

Hi Christina, I hope that you had a safe and Happy Thanksgiving.

I am working thru figuring out what exactly was missed on the electronic filing of our FCC Form 525.

What we had in place didn't work. I need to make sure I have a handle on exactly what happened and how to prevent it going forward.

The process that we had in place was:

One person prepares and there is a review of the information.

Next person reviews and then enters the information.

The CFO reviews and certifies the information.

Certification confirmation is received and saved.

This was done at least a couple of days before the due date to avoid missing dates, or in case computers are down.

The process that I have right now is:

One person prepares and there is a review of the information.

Next person reviews and then enters the information.

The CFO reviews and certifies the information.

Certification confirmation is received and saved.

Print a copy to check and make sure all categories were included.

Revise if required.

This was done at least a couple of days before the due date to avoid missing dates, or in case computers are down.

Can you help me get a screen print, or something that helps me document what/where in the certification process was missed? The information was in the system and reviewed twice. Something missed during certification dropped all of the line counts. We can't afford to have that happen again.

Thank you & Best Regards!

Sonja Nelson

Matanuska Telephone Association, Inc
Regulatory Reporting & Tariff Support Specialist
1740 S. Chugach Street
Palmer, AK 99645
907.761.2439 Direct Line
907.761.2651 Fax
snelson@mta-telco.com

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From: Christina Cunningham [<mailto:ccunningham@usac.org>]

Sent: Wednesday, September 16, 2015 6:03 AM

To: Sonja Nelson <snelson@mta-telco.com>

Subject: RE: Form 525 Waiver Instructions

Sonja,

I apologize for the delayed response as well as the bad links. I forgot the FCC just recently updated their website and links are no longer accurate.

Here are some updated links for you.

Submit an e-filing: <http://apps.fcc.gov/ecfs/upload/display;ECFSSESSION=Z2sJV50GTg4TQvPvZv5vPw31Lxqz5q8TDLnKJkZxwXS2r17Lt8y5l-543955373!310921635>

Similar type of Petition for Waiver, only this is ILEC line counts:
<http://apps.fcc.gov/ecfs/document/view?id=6520036828>

Petition for Waiver, CETC Form 525:
<http://apps.fcc.gov/ecfs/comment/view?id=5515181050>

I hope those two examples help. To answer your question – yes, the 3 months of support that will be impacted are August, September and October; which for High Cost purposes are 3rd Quarter data month (July, August and September).

Let me know if you need anything else.

Thanks,

Christina Cunningham
202-263-1647 (ph)
ccunningham@usac.org | www.usac.org

From: Sonja Nelson [<mailto:snelson@mta-telco.com>]
Sent: Monday, September 14, 2015 8:09 PM
To: Christina Cunningham
Cc: Marcel Numa
Subject: RE: Form 525 Waiver Instructions

Christina, I am seeing that the ICLS box is not checked on the March 2015 submission. We do have it corrected for the July 2015 submission.

I was not able to get to the links below. I will continue to search the web and see what I can find as an example waiver request.

I would like to make sure I understand which months we will be short. Will it be August, September and October?

Thank you for your assistance!

Sonja Nelson
Matanuska Telephone Association
Regulatory Reporting & Tariff Support Specialist
907-707-2439
snelson@mta-telco.com

From: Christina Cunningham [<mailto:ccunningham@usac.org>]
Sent: Monday, September 14, 2015 11:41 AM
To: Sonja Nelson <snelson@mta-telco.com>
Cc: Marcel Numa <mnuma@usac.org>
Subject: Form 525 Waiver Instructions

Sonja,

As the Form 525 filing deadlines are setup in the FCC Rules, MTA will have to request for the FCC to waive the filing deadline requirements. Requests for Waivers can be filed with the FCC via their electronic filing system (recommended) or through conventional mail. The Proceeding Number will be 96-45 and then you can upload your request.

Below is the e-filing link and also a sample request for waiver from a carrier and the Order in which it was subsequently granted. The request was made on 12/17/2009 and the FCC order was on 6/4/2010. This should give you an idea about how long it sometimes takes to have a decision made.

E-file: <http://fjallfoss.fcc.gov/ecfs/upload/display?z=oj6y9>

Example Request: <http://fjallfoss.fcc.gov/ecfs/document/view?id=7020354722>

I hope this helps and please do not hesitate to contact me if you have any additional questions.

Thanks,

Christina Cunningham
Program Analyst | High Cost Division
202-263-1647 (ph)
Ccunningham@usac.org | www.usac.org

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