



Interstate Telcom Consulting, Inc.

Independent Telecommunications Consultants

Filed Via ECFS

January 4, 2016

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

Re: Connect America Fund, WC Docket No. 10-90

Dear Ms. Dortch:

Nelson Communications Cooperative (Study Area Code 330918) is an ILEC serving customers in Buffalo, Dunn, Pierce, and Pepin counties, Wisconsin. In reviewing Version 2.1 of the A-CAM illustrative results and comparing the competitive blocks with the Form 477 deployment files released by the Wireline Competition Bureau (WCB) on November 10, 2015, an error was found with a neighboring company's deployment reporting. The neighboring company reported serving all blocks within the study area boundary of Nelson Communications Cooperative with Fiber to the Home (FTTH) technology.

Nelson Communications Cooperative, along with Interstate Telcom Consulting, Inc. (ITCI) reached out to the neighboring company, West Wisconsin Telcom Cooperative, Inc. (Study Area Code 330971) and discussed the issue. It was found that West Wisconsin Telcom was erroneously reporting census blocks in their Form 477 deployment file. This erroneous filing has eliminated a large portion of the A-CAM support for Nelson Communications Cooperative in Version 2.1, released on December 17, 2015.

West Wisconsin Telcom has since revised their reported FCC Form 477 deployment files for the reporting dates: 6/30/2014, 12/31/2014, and 06/30/2015. Originally, all blocks in all counties that West Wisconsin Telcom served were reported in the deployment file. The revision now reflects only those census blocks which are within West Wisconsin Telcom's own study area boundary. The revisions were completed and submitted on December 31, 2015.

We respectfully request that the WCB and the FCC, along with Cost Quest, produce another set of A-CAM illustrative results reflecting the revisions to the Form 477 deployment file, so that Nelson Communications Cooperative will not lose model based support based on incorrect data.

Sincerely,

A handwritten signature in blue ink that reads "Jerry Burmeister".

Jerry Burmeister
Consulting Manager
Interstate Telcom Consulting, Inc.

Cc: Christy Berger, Executive Vice President Nelson Comm. Coop.
Alex Minard, WCB
Katie King, WCB